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**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

MARION SINCLAIR

PROSE Plaintiff,

v.

ANDY MEISNER, in his official capacity as Oakland County Treasurer; OAKLAND COUNTY, a municipal corporation; OAKLAND COUNTY TAX TRIBUNAL, THE CITY OF SOUTHFIELD, a municipal corporation and the following officers, agents, and employees both personally and in their official capacities (KENSON SIVER, FREDERICK ZORN, GERALD WITKOWSKI, SUE WARD-WITKOWSKI, IRV LOWENBERG, MICHAEL MANDLEBAUM, DONALD FRACASSI, DANIEL BRIGHTWELL, MYRON FRASIER, LLOYD CREWS, NANCY BANKS); SOUTHFIELD NON PROFIT HOUSING CORPORATION, a 501 (c) 3 corporation and its officers, employees, and agents both personally and in their official capacities (BOARD PRESIDENT KENSON SIVER; MITCHELL SIMON, TREASURER; MICHAEL MANDELBAUM, BOARD MEMBER; FREDERICK ZORN, BOARD MEMBER; RITA FULGIAM-HILLMAN, LORA BRANTLEY-GILBERT, EARLENE TRAYLER-NEAL); SOUTHFIELD NEIGHBORHOOD REVITALIZATION INITIATIVE, LLC, a Michigan based corporation and its officers, employees, and agents both personally and in their official capacities (FREDERICK ZORN, MICHAEL MANDELBAUM, ETOILE LIBBETT), HABITAT FOR HUMANITY, a Michigan based corporation and its officers, employees, and agents in their official and personal capacities; and GTJ CONSULTING, LLC and JBR DISPOSAL, LLC, both Michigan based corporations and its officers.

Case No. 18-cv-14042.

Terrance G. Berg

United States District Judge

Stephanie Dawkins-Davis

United States Magistrate Judge

Feb, 5<sup>th</sup>, 2019

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1 employees, and agents in their official  
2 capacities, jointly and severally,

3 Defendants.

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5 **PLAINTIFF'S FIRST AMENDED COMPLAINT**

6 This is an action based on long-standing and ongoing violations of Plaintiff  
7 Constitutional rights related to improper transfer to a private corporation of her real  
8 property. The Plaintiff's property was taken by the County subject to tax  
9 foreclosure per the Michigan General Property Tax Act (MI-GAP), although the  
10 Plaintiff tried on several occasions to get the annual property tax abatement  
11 allowed by Michigan law by filing an application with the Oakland County Tax  
12 Tribunal, however her application for tax abatement was approved and within a  
13 month was withdrawn. Subsequently after the Plaintiff reached out to the Mayor,  
14 City Manager, and the County Treasurer seeking relief as she is on a fixed income,  
15 the County took the Plaintiff's property and transferred it to a private corporation  
16 improperly through a series of transfers by Defendants in an effort to mask the  
17 dubious nature of the transfers. Plaintiff contends that the transfer of her property  
18 in this fashion was a thinly veiled attempt to circumvent Michigan law, which  
19 limits cities, villages, and townships to only purchasing tax foreclosed properties in  
20 their communities for a public purpose. Michigan law has detailed specific steps  
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1 that must be followed prior to taking citizen's property and are outlined in the  
2 General Property Tax Act of 1893 (MI-GAP).  
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4 The Plaintiff's property is located in Southfield, Michigan, the city with the  
5 highest number of tax foreclosures of any city in Oakland County since 2012.  
6 Year after year Southfield has had this dubious distinction with grant dollars,  
7 programs, and plans to keep residents in their home largely nonexistent and one-  
8 time relief mandated by law through the Oakland County Tax Tribunal not  
9 available to residents who meet income criterias. Southfield is now  
10 overwhelmingly African-American (70.4% in 2010 Census), mostly former-  
11 Detroiters who moved to the city in large numbers beginning in the late 70's and  
12 80's. Although Southfield boasts a majority African-American population, still  
13 over 95% of the police and fire departments and most of the long-term (over  
14 \$50,000 per year) employees are Caucasian  
15 (<https://www.youtube.com/watch?v=TIYItUJFYFk> at 1:35:18 from 12/17/2018  
16 meeting).  
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22 Although not having always been friendly to African-Americans, Southfield  
23 has a long history of being the most prejudiced city in Oakland County and was the  
24 beneficiary of most of the white flight that left Detroit after the civil uprising there  
25 and the subsequent nomination of the first African American mayor in the city's  
26 history. Additionally since the 1930's most of the homes in Southfield had  
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1 restrictive covenants where African-American and other ethnic families were not  
2 allowed to purchase homes and businesses. In fact, most real estate agents refused  
3 to even show homes to African-American homeowners and the only way to  
4 purchase a home was by using a non African-American straw buyer who would  
5 then transfer the property to an African-American family.  
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8 Of late, the city has transitioned some with its first African-American mayor  
9 in 2001. The mayor left in 2015 to become a congresswoman. After the  
10 Congresswoman left, the new mayor and his administrative team (many that have  
11 been in Southfield for decades), begin putting policies and procedures in place to  
12 raise revenue for the city as a result of Northland mall closing after an African-  
13 American male lost his life in a chokehold with guards and officers.  
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16 Beginning in 2015, through resolutions from city council and funding from  
17 the various Defendants in this lawsuit, the city set out to flip houses by transferring  
18 properties subject to tax foreclosure to private corporations prior to the mandated  
19 state auction required by Michigan law. In addition to flipping houses, the city  
20 created a series of draconian policies that had the affect of removing the Plaintiff  
21 and the other mostly African-American homeowners from their homes, and  
22 stripping them of the equity built-up over time in their properties. One  
23 commonality that exists between all of the foreclosed properties is that all of the  
24 properties were paid off free-and-clear, and had no encumbrances.  
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1 Because Defendants persists in their misconduct, this action is brought by  
 2 Plaintiff in her individual capacity to redress the undisputed historic and ongoing  
 3 discriminatory conduct perpetrated by the Defendants. Plaintiff seeks temporary  
 4 injunctive relief on preventing any subsequent transfers of her property by  
 5 Southfield Neighborhood Revitalization Initiative, LLC ("SNR") until resolution  
 6 of this lawsuit by this honorable court as a result of the irreparable harm that she  
 7 suffered as a result of being unlawfully evicted from her home by SNR and City of  
 8 Southfield agents and employees who changed the locks while Plaintiff was home  
 9 sitting on the couch watching television. Although the city of Southfield has its  
 10 own judicial courthouse, SNR and the other Defendants in this lawsuit could not be  
 11 bothered by getting a legal writ of eviction and instead evicted the Plaintiff from  
 12 her property. The Plaintiff seeks to invoke protections afforded her under USC  
 13 §1983, the Fair Housing Act of 1968 – 42 USA 3601-3619, and other protections  
 14 available under the US Constitution's Equal Protection Clause, the 14<sup>th</sup> and 5<sup>th</sup>  
 15 Amendments of the US Constitution, and civil RICO statutes available federal  
 16 statutes and through the State of Michigan.

### 23 **STATEMENT OF THE CASE**

24 1. Defendant Oakland County (OAKGOV) discriminated against Plaintiff  
 25 and other African-American Southfield homeowners facing tax foreclosure in  
 26 2016, 2017, and 2018 on the basis of race by, among other things, allowing private  
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1 corporations to purchase tax foreclosed properties ahead of the state mandated  
2 public auction - unjustly enriching the private corporations in the process; all the  
3 while abridging U.S. Constitutional guarantees to the Plaintiff in the 5<sup>th</sup> and 14<sup>th</sup>  
4 Amendments in addition to the protected liberty interest afforded African-  
5 Americans by 42 USC §1983 and additional protections afforded Plaintiff by the  
6 Michigan Constitution. Additionally OAKGOV and Defendant City of Southfield  
7 (SFIELD) did not provide the Plaintiff the form for filing an annual poverty  
8 exemption, even though Plaintiff applied and was approved by SFIELD for home  
9 repairs -- based on Plaintiff meeting income qualifications.

13 2. Defendant OAKGOV intentionally concealed its illegal transfer of  
14 Plaintiff's tax foreclosed property to a private corporation ahead of the public  
15 auction by transferring it first to the City of Southfield (SFIELD) in a series of  
16 circuitous transactions. At the same time Defendant SNR had forwarded funds to  
17 SFIELD in the last week of June in order to deprive Plaintiff and other African-  
18 American homeowners that wished to assert their right to bid on and repurchase  
19 their homes at the county auction. This end run around Michigan law equates to a  
20 unconstitutional taking expressly forbidding by MCL § 213.23(2). This insured  
21 that Defendant SNR, their owners SFIELD and the Southfield Non Profit Housing  
22 Corporation ("SNPHC") and their employees, agents, and contractors alone would  
23 benefit and become unjustly enriched from the improper property transfer of  
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1 Plaintiff's home. This secret decision also denied Plaintiff any opportunity to plan  
2 for, protect herself against, or mitigate the sudden and devastating impacts on the  
3 loss of her home and the equity built up therein.  
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5 3. Throughout the preceding months of April 2016 to November 2019  
6 OAKGOV and the other Defendants have been contacted by multiple citizen  
7 groups, agencies, and homeowners affected to request reversal of the city's policy  
8 of using OAKGOV to circumvent the clear language and intent of the MI-GAP act.  
9 The administration of OAKGOV through its County Executive, Treasurer, and  
10 surrogate Defendants acted under color of law by allowing the "Southfield  
11 Defendants" to circumvent the MI-GAP act by infringement upon Plaintiff's  
12 constitutional rights.  
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16 4. Defendant Andy Meisner also violated the Plaintiff's constitutional rights  
17 by not allowing Oakland County residents to use (MCLA § 211.78n (5) ) a new  
18 law created in 2015 by the Michigan legislature allowing Michiganders behind in  
19 property taxes until 6/30/2016 to setup a payment arrangement with their county or  
20 payoff their delinquent taxes. In this case Defendant Meisner created a new class  
21 of residents like the Plaintiff who were prevented from using the 6/30/2016  
22 deadline whereas residents of Wayne County were allowed to use the new law.  
23 Instead Defendant Meisner cancelled the payment plan of \$50.00 that the Plaintiff  
24 was on in 2015 and demanded that Plaintiff, a senior citizen on a fixed income,  
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1 sign a new payment plan agreeing to pay more than \$145.00 a month in payments.

2 This resulted in the Plaintiff missing payments and the resulting foreclosure.

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4 During conversations with Defendant Meisner after the illegal eviction, Plaintiff

5 asserts that Meisner was abrasive, rude, unprofessional, dismissive, and actually

6 hung up the phone during their conversation, although Plaintiff purchased her

7 home at the height of the economic downturn for cash and planned to live in her

8 home for the rest of her life. Instead Plaintiff was illegally evicted and had the

9 pleasure of meeting Defendants Siver, Zorn, Gerald Witkowski, and several other

10 SNR workers, contractors, and agents (GTJ Consulting, LLC and JBR Disposal,

11 LLC) at her home after CTJ and JBR broke in and changed her locks -- all without

12 the benefit of a court order. The defendants were so hell- bent on getting Plaintiff

13 out of her home that Defendant Siver took Plaintiff in his Cadillac Escalade to the

14 senior citizen home where Plaintiff currently resides, although her home is still

15 vacant after being stripped of all of her belongings. The behaviors of Defendant

16 Meisner and the other Defendants named above had the effort of discriminating

17 against Plaintiff, an African-American, directly breaching equal protection and

18 procedural due process guarantees in the U.S. and Michigan Constitutions.

19 Additionally, Plaintiff applied for and was approved for a one-year exemption

20 from property taxes, however, the City of Southfield appealed the ruling and



1 Plaintiff received another letter saying that she WAS NOT tax exempt – although  
2 she met income guidelines.  
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4 5. While OAKGOV's neighboring county – Wayne – allowed its residents to  
5 take advantage of the Michigan's legislatures extension to June of 2016, Defendant  
6 Meisner did not, creating an equal protection argument for the Plaintiff, where two  
7 counties apply Michigan law differently – abridging Plaintiff's procedural due  
8 process rights and equal protection guarantees in the U.S. and Michigan  
9 Constitutions.  
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12 6. Plaintiff seeks to reverse the negative impacts of the discrimination she  
13 suffered at the hands of the Defendants. Plaintiff also seeks injunctive relief,  
14 judicial notice on whether the methods the Oakland County Treasurer uses to  
15 transfer properties ahead of the public auction to cities, townships, and villages –  
16 for express sales to private corporation is proper, and any other remedy this  
17 honorable Court may find.  
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## 22 **JURISDICTION AND VENUE**

23 7. This Court has jurisdiction over this suit brought under the Fair Housing  
24 Act, 42 USC 3601-3619; the fourteenth Amendment to the United States  
25 Constitution; Article I, Section 17 of the Michigan Constitution; and 42 USC 1983.  
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1           8. Venue is proper in this court in that Defendant Oakland County and  
2 Defendant City of Southfield are political subdivisions of the State of Michigan;  
3 Defendant Andy Meisner and the Oakland County Tax Tribunal are official  
4 political subdivision of the State of Michigan and Plaintiff is suing Defendant  
5 Meisner and the Oakland County Tax Tribunal in their official capacities;  
6 Defendants Ken Siver, Frederick Zorn, Sue Ward-Witkowski, Gerald Witkowski,  
7 Irv Lowenberg, Michael Mandlebaum, Donald Fracassi, Daniel Brightwell, Myron  
8 Frazier, Lloyd Crews, and Nancy Banks are all officials of a political subdivision  
9 of the State of Michigan sued in their official and personal capacities; Defendants  
10 Southfield Non Profit Housing Corporation (Ken Siver, Mitchell Simon, Michael  
11 Mandelbaum, Frederick Zorn, Rita Fulgiam-Hillman, Lora Brantley-Gilbert,  
12 Earlene Traylor-Neal), Southfield Neighborhood Revitalization Initiative, LLC  
13 (Frederick Zorn, Michael Mandelbaum, Etoile Libbett), GTJ Consulting, LLC, and  
14 JBR Disposal, LLC are Michigan based corporations sued as corporations  
15 including its officers, employees, and agents both personally and in their official  
16 capacities; Habitat for Humanity of Oakland County -- including the Plaintiff  
17 named herein resides and operates within the State of Michigan.

18           9. The injuries claimed by Plaintiff named herein occurred and continue to  
19 occur in the County of Oakland, in the State of Michigan.

**THE PARTIES**

10. Plaintiff, Marion Sinclair, is an African-American property owner who purchased her home in Southfield in 2009 and is facing tax foreclosure as a result of being delinquent on her property taxes and the improper transfer of her property to a private corporation ahead of the public auction in violation of Michigan law (MCL 211.78m). As a result of reaching out to other Southfield homeowners facing tax foreclosure Plaintiff found records and details of the improper transfer and authorizations and approvals by SFIELD officials.

11. Defendant Oakland County is a political and corporate entity organized and existing under the laws of the State of Michigan.

12. Defendant Andy Meisner (also referred to as “Defendant Oakland County Treasurer”) occupies the office of the Oakland County Treasurer and is sued in his official capacity.

13. Defendant Andy Meisner, the Oakland County Tax Tribunal, and Defendant Oakland County are referred to as the (“Oakland County Defendants.”)

14. Defendant City of Southfield (SFIELD) is a political and municipal corporate entity organized and existing under the laws of the State of Michigan. SFIELD was incorporated as a city to prevent annexation to the city of Detroit in 1958. SFIELD was the biggest beneficiary of “white flight” beginning in the late

1 60's after the civil uprising in 1968 and SFIELD became the home of most Detroit  
2 fortune 100 corporations as a result.

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4 15. Defendants City of Southfield, Ken Siver, Frederick Zorn, Sue Ward-  
5 Witkowski, Gerald Witkowski, Irv Lowenberg, Michael Mandlebaum, Donald  
6 Fracassi, Daniel Brightwell, Myron Frazier, Lloyd Crews, and Nancy Banks are  
7 Southfield City officials and are sued in their official and personal capacities;  
8 Defendants Ken Siver, Mitchell Simon, Michael Mandelbaum, Frederick Zorn,  
9 Rita Fulgiam-Hillman, Lora Brantley-Gilbert, Earlene Traylor-Neal are board  
10 members of Southfield Non Profit Housing Corporation which is a Michigan based  
11 non-profit corporation and are sued in their official and personal capacities;  
12 Defendants Frederick Zorn, Michael Mandelbaum, Etoile Libbett, and Gerald  
13 Witkowski are sued in their official and personal capacities as board members or  
14 program managers of the Southfield Neighborhood Revitalization Initiative, LLC,  
15 a Michigan based corporation; Defendant Habitat for Humanity, includes multiple  
16 divisions that operate across Michigan and is sued as a corporation; and included in  
17 this list are referred to collectively as "Southfield Defendants."

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19 16. Defendant Kenson Siver is the current mayor of SFIELD and holds the  
20 highest legislative position and as mayor directs all affairs of the city through his  
21 elected team which includes a 7 person city council, a full-time city administrator,  
22 a city attorney, a city treasurer and planner and hundreds of employees. Although  
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1 Defendant Siver is a part-time mayor per city charter, he works overtime as the  
2 President of the Board of the Southfield Non Profit Housing Corporation (NON-  
3 PROFIT) which provided the funds for the scheme that is the subject of this action  
4 and according to city council minutes is in a partnership with the NON PROFIT  
5 per approved minutes in February 2016. Defendant Siver along with the city  
6 administrator and city council is the author of many of the draconian policies  
7 developed by SFIELD including the scheme to defraud African-American  
8 homeowners out of their homes as a result of a downturn in the local economy and  
9 residents having problems maintaining their homes and paying property taxes.  
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12 17. Defendant Sue Ward-Witkowski is an attorney licensed by the state of  
13 Michigan to practice law in the state and has worked in the city's legal department  
14 for over 20 years and up until August of this year was the city attorney for the city  
15 of Southfield. Defendant Ward-Witkowski was the creator of many purported  
16 'legal' documents developed by the city that blur the line on legality related to  
17 code enforcement, cash for keys, property disputes, and resident issues and  
18 complaints to the SFIELD. Defendant Ward-Witkowski is one of the architects of  
19 the scheme crafted to take tax-foreclosed homes in SFIELD purchased from  
20 OAKGOV ahead of the required state auction for an average of \$15,000 - \$20,000  
21 - and sell them through private corporations for full market value to the tune of  
22 millions of dollars per year in revenue. Defendant Ward-Witkowski and  
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1 Defendant Gerald Witkowski are husband and wife and as a married couple  
2 benefitted from \$2,500 that was supposed to be paid to Plaintiff, however facts  
3 show that the check was made out to the Witkowski Defendants and cashed  
4 without Plaintiff getting any remuneration. Instead, Plaintiff received a 1099  
5 saying that she received the \$2,500 directly.  
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8 18. Defendant Donald Fricassi is currently a city council member but over  
9 the past 30 years has also served as mayor alternately. Defendant Fricassi was the  
10 champion behind many positive programs in SFIELD such as the Neighborhood  
11 Stabilization Program which helped residents stay in their homes, however, of late  
12 he has been intimately involved in policies and procedures related to contractors  
13 operating in the city due to his long-term history in managing SFIELD and  
14 familiarity with long-term contractors, vendors, employees, and agents.  
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17 19. Defendant Frederick Zorn is the long time city administrator of SFIELD  
18 and is responsible for the day-to-day activities of the city and all of its concerns.  
19 Defendant Zorn also sits on the board of directors of the NON-PROFIT as well as  
20 SNR. In his role as city administrator, Defendant Zorn's primary job responsibility  
21 is to insure the smooth running of the city and all of its departments and divisions,  
22 and to liase with city council, the mayor, and all contractors, vendors, and  
23 professionals who contract with SFIELD. Per city charter Defendant Zorn is  
24 forbidden from exercising nepotism related to conflicts of interest related to family  
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1 members and must reside in the city. Defendant Zorn acting in his triplicate  
2 capacities as the city administrator (to be defined further during discovery), a board  
3 member of both the NON-PROFIT and SNR was also one of the chief architects of  
4 this property acquisition scheme and provided authorization and final approval on  
5 many of the transactions.  
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8 20. Defendant Irv Lowenberg is currently the SFIELD city treasurer and  
9 responsible for all financial processes in the city. One of Defendant Lowenberg's  
10 primary responsibilities is collection of property taxes from residents and insuring  
11 cohesiveness with OAKGOV's treasurer related to Michigan State property laws.  
12 Defendant Lowenberg's treasury department policies and procedures are  
13 developed by the city council and signed off by the mayor. Any transfer of  
14 property from or to the city must be authorized and given final approval by  
15 Defendant Lowenberg. Other irregularities that arose and to be fully documented  
16 during discovery have been the wholesale reduction in property taxes on Plaintiff's  
17 as well as many of the other properties transferred to SFIELD and SNR from  
18 OAKGOV, resulting in greatly reduced taxes for SNR. Additionally, Defendant  
19 Lowenberg, and the Southfield Defendants, along with Defendant M.S. Title  
20 Agency, LLC, colluded in this conspiracy to evade Michigan law by doing a 2-step  
21 process of a transfer of the 2016 properties from the Oakland County Treasurer to  
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1 the City of Southfield all the while disguising the real-transfer of properties to  
2 SNR.  
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4 21. Defendant Andy Meisner also serves on the Oakland County Habitat for  
5 Humanity Board of Directors. Oakland County Habitat for Humanity benefits  
6 directly from this scheme and was touted by the SFIELD Treasurer Irv Lowenberg,  
7 as being the entity that had purchased all of the 2016 properties from SFIELD in  
8 2016 – and that all of the homes would be sold for full market value . Facts show  
9 that Defendant Habitat was not the recipient of the transfer of the 2016 parcels  
10 however Plaintiff has documentation to prove that Habitat For Humanity and it's  
11 employees, agents, and contractors received over \$63,000 in 2016 from SNR.  
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14 22. Defendant Myron Frazier is currently a city council member and  
15 proposed or seconded the motions of many of the resolutions related to this transfer  
16 of property.  
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19 23. Defendant Nancy Banks served as the Southfield city clerk for more than  
20 20 years and recently decided not to run for another term. Defendant Banks signed  
21 off on the transfer of the Plaintiff and other homeowner properties related to the  
22 2016 tax foreclosures and along with the mayor transferred them to SNR in  
23 contravention of state law.  
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26 24. Defendant SNR is a Michigan based corporation created in June 2016 by  
27 SFIELD City Manager Frederick Zorn and NON-PROFIT Treasurer Mitchell  
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1 Simon through registration with Michigan's Department of Licensing and  
2 Regulation. Defendant SNR is touted to be a single member LLC wholly owned  
3 by NON-PROFIT although contrary information exists about SFIELD being a part  
4 owner and sharing in the profits. Defendant SNR and its officers, employees, and  
5 agents worked with the other Defendants to insure tax-foreclosed properties were  
6 transferred to SNR ahead of the state auction causing harm to Plaintiff and other  
7 homeowners facing foreclosure in 2016, 2017, and 2018. Defendant SNR also  
8 directed its attorneys, agents, and employees to administer a cash-for-keys effort  
9 headed up with documents created by Defendant Ward-Witkowski and her  
10 designates that subjected many of the affected residents to discriminatory treatment  
11 and harassment through adhesion contracts sprung on tax foreclosed residents at  
12 the last moment during the Christmas holiday.

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18 25. Defendant Gerald Witkowski has worked for SFIELD for more than 20  
19 years and was the director of code enforcement. When this scheme to have the  
20 city, its employees, agents and affiliates begin flipping the properties of mostly  
21 African-Americans began, although Defendant Witkowski had retired, he was  
22 activated to become project manager of SNR and the other Southfield Defendant's  
23 plans to remove residents from their homes without the benefit of judicial  
24 oversight. Defendant Witkowski still has a business card touting a City of  
25 Southfield email address and telephone number although city records show he is  
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1 the project manager of SNR. Defendant Witkowski also profited illegally from  
2 this scheme by taking over \$2000.00 that was earmarked for Plaintiff and  
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4 disposing of the monies through his own devices -- to be documented through the  
5 discovery process. Plaintiff asserts that all of the Defendants actions together  
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7 equate to fraud and that this matter needs to see the light of day because even after  
8 the illegal eviction Plaintiff received an invoice for the move from another entity  
9 that is not names above.

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11 26. Defendant Frederick Zorn although SFIELD's city administrator also  
12 serves double and triple duty as president of SNR's board of directors and as a  
13 board member of the NON PROFIT. In his role as president of the SNR board,  
14 Defendant Zorn directs the day-to-day operations of SNR and is the chief signer on  
15 checks over \$500,000 and responsible for all operations. Defendant Zorn also  
16 worked closely with all other Defendants in implementation of the scheme to  
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18 improperly transfer properties from OAKGOV one week before the scheduled  
19 auction. Additionally, Defendant Zorn personally visited plaintiff's home days  
20 before the illegal eviction and knew the Plaintiff's home was not unoccupied or  
21 abandoned.

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24 27. Defendant Michael Mandelbaum is also a SFIELD city council member,  
25 a member of NON-PROFIT's board of directors, and serves as a board member of  
26 SNR. In his role as board member of SNR, Defendant Mandelbaum worked  
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1 diligently to shepherd SNR related legislation through the city council and also  
2 liaised with OAKGOV's treasurer, employees and agents to insure SNR's profit  
3 priorities were met. Additionally, as an SNR board member, defendant,  
4 Mandelbaum worked with the other SNR board members on selection of real estate  
5 professionals, contractors, vendors, legal and financial experts and agents hired to  
6 accomplish tasks. Additionally, Defendant Mandelbaum also steerheaded bus  
7 tours of recently foreclosed homes for Caucasian homebuyers.  
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11 28. Defendant Etoile Libbett is a member of the SNR board of directors and  
12 has been a real estate professional for more than 20 years. Defendant Libbett  
13 helped to develop the property acquisition and sell policies of SNR and is a  
14 signatory on checks issued by SNR. In her role as board member, Defendant  
15 Libbett also directs which contractors are hired to clean out, paint, and repair  
16 houses, and which vendors are selected for other professional services including  
17 landscaping, curb appeal, advertising, and the like. Through discovery Plaintiff  
18 seeks to compel Defendant Libbett to answer questions related to agency and  
19 double dipping because she is a member of the SNR board of directors, and also a  
20 beneficiary of real estate listing services, in addition to playing a SNR-vendor role  
21 in a LLC listed at her home address -- owned by one of her family members.  
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26 29. Defendant Habitat for Humanity is a Michigan based not-for-profit  
27 corporation that has several subdivisions across the state all operating under the  
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1 same name; although some operate under different policies and procedures  
 2 coordinated by their national 501 (c) 3 parent company. Defendant Habitat for  
 3 Humanity was selected by SFIELD, SNR, and other Defendants to be the entity  
 4 that profited from repairs, fixups, property transfers, and other construction and  
 5 professional services related to the scheme. There is a singular thread that goes  
 6 between Defendant Habitat to the OAKGOV treasurer who is a board member for  
 7 Habitat and all of the other Defendants. When Plaintiff was initially informed that  
 8 her property had been sold to the city, the city treasurer informed Plaintiff that all  
 9 the properties had been sold to Habitat. Defendant Habitat's board, officers,  
 10 employees, contractors, and agents have been complicit throughout this improper  
 11 transfer of property one week prior to the state mandated auction and even got the  
 12 job of fixing Plaintiff's roof although SFIELD had already approved several  
 13 thousands of dollars in repairs in the months leading up to Plaintiff's illegal  
 14 eviction.

## 21 **CAUSES OF ACTION**

### 22 **COUNT ONE**

#### 23 **RACE DISCRIMINATION IN VIOLATION OF THE FAIR HOUSING ACT**

24 **(42 USC 3601-3619)**

1           30. Plaintiff realleges and incorporates by reference the preceding  
2 paragraphs of this Complaint as though set out here word for word.  
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4           31. Under the Fair Housing Act, it is unlawful for any person, including a  
5 municipality or other governmental entity, to “make unavailable or deny[] a  
6 dwelling to any person because of race.” 42 USC 3604(a).  
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8           32. A governmental body violated 42 USC 3604(a) when its neutral policies  
9 or practices have an unjustified disparate impact on members of a racial group.  
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11           33. The Oakland County Defendants’ policies caused African-American  
12 Plaintiff and other mostly African-American homeowners in Southfield to lose  
13 their homes through tax foreclosure at a higher rate than non-African-American  
14 homeowners in Oakland County.  
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16           34. The Oakland County Defendant had no legitimate justification for  
17 foreclosing on Plaintiffs property by skipping state mandated steps in the tax  
18 foreclosure process by allowing the Southfield Defendants to circumvent state law  
19 provisions that disallow transfer to private corporations ahead of the mandated  
20 state auction. Even is there is a legitimate justification, there are less  
21 discriminatory alternatives available to the Oakland County Defendant that would  
22 achieve the same interests as these policies and practices.  
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**Conspiracy and Fraud in Violation of the Racketeer Influenced and Corrupt  
Organizations Act (RICO), 18 U.S.C. (sec) 1962, and Request for Treble  
Damages.**

46. All Defendants mentioned in this lawsuit engaged in a careful-  
conspiracy to defraud by collectively agreeing to conceal the intent of the transfer  
of real property of Plaintiff and other mostly African-American residents of  
Southfield, MI, to private corporations in contravention of Michigan laws which  
limit which state of Michigan entities that can circumvent the mandated public  
auction and purchase tax foreclosed properties ahead of the auction – effectively  
disenfranchising the United States constitutional rights of the Plaintiff and others  
similarly situated throughout the City of Southfield.

47. Beginning in June, 2016, and proceeding to now Defendants acting  
under the color of law all operating through the policies and procedure of  
OAKGOV and SFIELD created a scheme which successfully transferred tax  
foreclosed properties of predominantly African -American residents of Southfield,  
Michigan, to SNR and NON-PROFIT, in a circuitous transaction created to evade  
state disclosure requirements for tax reverted properties . NON-PROFIT, according  
to a letter from Defendant Fred Zorn, is also the sole member of SNR's corporation  
and the primary funding source of SNR and HABITAT's endeavors related to the  
Plaintiff's and other illegally transferred properties in 2016, 2017, and 2018, that

1 are the subject of this Complaint based on documentation in Plaintiff's possession.  
2 Additionally, Defendants used the services of M.S. Title Agency, LLC as part of  
3 the conspiracy.  
4

5 48. All Defendants contributed to the scheme to defraud African-American  
6 Plaintiff and other mostly African-American residents of Southfield - as the low  
7 hanging fruit of Oakland County which has had the highest tax foreclosure rates in  
8 the county since 2015 ([https://www.bridgemi.com/public-sector/feds-oakland-](https://www.bridgemi.com/public-sector/feds-oakland-countys-discriminatory-housing-policies-fuel-segregation)  
9 [countys-discriminatory-housing-policies-fuel-segregation](https://www.bridgemi.com/public-sector/feds-oakland-countys-discriminatory-housing-policies-fuel-segregation)) because had OAKGOV  
10 not participated than Plaintiff would have had the opportunity to bid on and  
11 repurchase her property at the scheduled county auction set for the first and second  
12 weeks of July 2016.  
13

14 49. For the past five years prior to 2016, the Treasurer of Oakland County  
15 was aware of how many tax foreclosed properties had been seized by the County  
16 and with adequate discovery plaintiff asks the chance to prove all defendants roles  
17 in this coordinated conspiracy to defraud plaintiff of his property and Plaintiffs  
18 continued peaceful enjoyment of his property free from illegal speculators  
19 operating outside of Michigan GAPT laws.  
20

21 50. The Oakland County Tax Tribunal ("Tribunal") provided false hope to  
22 Plaintiff by informing her that she was exempt from taxes for one year – and then  
23 revoked its approval. Unbeknownst to Plaintiff, TRIBUNAL had already reversed  
24  
25  
26  
27  
28

1 its decision. Additionally Defendant Meisner sits on the HABITAT board and was  
 2 present at both Southfield city council sessions when the \$1,500,000 seed money  
 3 from the NON-PROFIT was discussed. On this date, Defendant Meisner, also  
 4 made a presentation to the SFIELD city council about tax foreclosures. (See  
 5 exhibit 2)  
 6

7  
 8 51. As a result of this collective action to defraud Plaintiff and other  
 9 mostly African –American homeowners in Southfield facing tax foreclosures,  
 10 Defendant Oakland County Treasurer did not allow Southfield residents to take  
 11 advantage of the new Michigan law (MCLA § 211.78n (5) ) that gave struggling  
 12 Michiganders until June 30<sup>th</sup>, 2016 to pay the arrears on their property taxes or  
 13 enter a payment plan -- dissimilar to how Wayne County allowed it's residents to  
 14 take advantage of the law. (Detroit Free Press link -  
 15 [https://www.freep.com/story/money/business/michigan/2016/06/30/wayne-county-](https://www.freep.com/story/money/business/michigan/2016/06/30/wayne-county-treasurer-taxes/86561128/)  
 16 [treasurer-taxes/86561128/](https://www.freep.com/story/money/business/michigan/2016/06/30/wayne-county-treasurer-taxes/86561128/)) Plaintiff has suffered injuries indicated above. Treble  
 17 damages are therefore appropriate under RICO to punish the conspiratorial nature  
 18 of Defendants' planned concealment of improper property transfer of Plaintiffs  
 19 home to SNR ahead of the public auction.  
 20  
 21  
 22  
 23  
 24  
 25

## 26 COUNT FIVE

### 27 **Forcible Illegal Eviction Under State Law**

1           52. Plaintiff hereby states and incorporates paragraphs 1 through 51 as if  
2 fully set forth herein.

3           53. Plaintiff was evicted without notice or legal process.

4  
5 Defendants are thus subject to a claim of damages by Plaintiff for damages, both  
6 statutory (MCL 600.2918(1)) and common law, for illegal eviction and  
7 consequential damages, including wanton or reckless acts, deliberate egregious and  
8 unlawful acts carried out in a way to extract maximum mental stress,  
9  
10 embarrassment, and harm to the Plaintiff with a callous disregard to the Plaintiff's  
11 home being occupied and not abandoned.

12 Wherefore, Plaintiff respectfully requests that the Court grant triple damages  
13  
14 pursuant to MCL 600.2918 (1) for all damages sustained for destruction of  
15 property and loss of enjoyment of home, along with attorney fees, interest and  
16 costs.  
17  
18  
19  
20  
21

22                           **COUNT 6**

23                           **CONVERSION**

24 Plaintiff hereby state and incorporate paragraph 1 through 53 as if fully set forth  
25 herein.  
26  
27  
28

1           54. Defendants, their employees, friends and third parties instigated  
2 removal, destruction of Plaintiff's property and converted or gave away Plaintiff's  
3 belongings.  
4

5           55. Defendants actions constitute common law conversion, and they also  
6 violate MCL 600.2919 a.  
7

8           56. Pursuant to MCL 600.2919a, Plaintiff is entitled to treble damages, as  
9 well as attorneys' fees.  
10

11           57. The acts of Defendants, and each of them, were undertaken in such a  
12 violent, dishonest and reprehensible manner that Plaintiff is entitled to exemplary  
13 damages.  
14

15           58. As a result of the Defendants conduct Plaintiff has suffered  
16 humiliation, fright, shock, mental anguish, emotional distress, embarrassment and  
17 loss of enjoyment of life forcible eviction from the premises and from Defendants  
18 attempts to gain control of Plaintiff's property after purchasing it in contravention  
19 of Michigan Property laws.  
20

21           WHEREFORE, Plaintiff demands judgment of Defendants in such amounts as the  
22 Court shall find just in the premises for their damages, both compensatory and  
23 exemplary, along with their attorney's fees, interest and costs.  
24  
25  
26  
27  
28

1           59. As a result of the conduct by OAKGOV and Southfield Defendants  
2 illustrated in 1 – 51 Plaintiff is subject to irreparably harm in the interest in their  
3 family's property. Recognizing the reluctance courts have to reverse tax-  
4 foreclosures, Plaintiff asserts that because of the depths of improper, tortuous, and  
5 to be determined by this honorable court – possibly illegal nature of the thinly  
6 veiled attempts to transfer Plaintiff's property to a private corporation in  
7 contravention of Michigan GPTA laws, that this court issue and preliminary  
8 injunction preventing SNR and all of the other defendants from transferring  
9 Plaintiff and any other Southfield Resident's property until a finding by this  
10 honorable court. The Michigan statute that controls the tax foreclosure process is  
11 the General Property Tax Act of 1893 and the plain language of the relevant statute  
12 is clear on the process for transferring tax foreclosed prior to the public auction and  
13 says "If the state elects not to purchase the property under its right of first refusal, a  
14 city, village, or township may purchase for a public purpose any property located  
15 within that city, village, or township set forth in the judgment and subject to sale  
16 under this section by payment to the foreclosing governmental unit of the  
17 minimum bid." MCL §211.78(2) The Michigan legislature forbids the taking of  
18 private property by a public corporation or state agency for transfer to a private  
19 entity and says this type of disposition of property is not considered a public  
20  
21  
22  
23  
24  
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28

1 purpose. MCLS §213.23(2) Thus Plaintiff will likely ultimately succeed based on  
2 the clear language of the statute. *Id.*

3  
4 60. Plaintiff asks this courts sincerest consideration of Plaintiffs request for  
5 award of a preliminary injunction awaiting the outcome of this case and asks that  
6 the court waive any bond as Plaintiff has already incurred many expenses related to  
7 attempting to keep the family's home and domicile. *Id.*

8  
9 61. Failure to grant the requested injunctive relief will cause irreparable  
10 harm to the Plaintiff by unjustly enriching the perpetrators and allowing Defendants  
11 to profit off the discrimination the Plaintiff suffered. Further, if Defendant  
12 OAKGOV is not restrained from continuing these dubious property transfers to  
13 private corporations in advance of the mandated public auction, no property owner  
14 is safe in Oakland County because lawlessness and injustice will rule the day in  
15 property transactions authorized by the Oakland County Treasurer. Also Plaintiff  
16 will never again have the opportunity to enjoy the property that their family saved  
17 money over several years to purchase their property at the height of the economic  
18 downturn. If OAKGOV can be successful in victimizing Plaintiff as well as the  
19 100 other mostly African-American homeowners who are in process of losing (or  
20 have lost) their properties as part of this scheme, no homeowner is safe in Oakland  
21 County as long as these draconian policies are allowed to continue. There is no  
22 adequate remedy at law for this harm because the Plaintiff's property is unique and  
23  
24  
25  
26  
27  
28

1 has become a treasured asset for Plaintiff and his family. Further, Plaintiff, filed  
2 this lawsuit in an attempt to preserve the interest in their home, several months shy  
3 of the three year statute-of-limitations on filing an action in federal court for a  
4 harm that occurred.  
5

6         62. The continuing, irreparable harm caused by the Defendants  
7 discriminatory actions and the toll of facing eviction and/or losing their ancestral  
8 home, far outweigh any possible harm that granting the injunctive relief to the  
9 Plaintiff might cause Defendants. Preliminarily enjoining Defendants' from  
10 continuing the destructive practice of allowing property transfers to private  
11 corporations ahead of the public auction will right-size policies and operating  
12 procedures affecting African-Americans in Oakland County especially.  
13  
14  
15

16         63. The lifelong harm caused to Plaintiff by Defendants's discrimination is  
17 irreparable and can never be adequately compensated with money. This harm has  
18 diminished the Plaintiff's standing in the community as a result of this tax  
19 foreclosure, and totally disrupted Plaintiff's family's security – especially after  
20 spending thousands of dollars to acquire, repair, and make the subject property  
21 their home. This far outweighs any monetary cost incurred by Defendants.  
22  
23 Importantly, Defendants could choose to allocate its finances more strategically  
24 and help their African-American Oakland County neighbors continue to stay in  
25 their homes and businesses.  
26  
27  
28





1 Enjoining the Oakland County Treasurer from continuing the practice of  
2 allowing private corporations to purchase properties in tax foreclosure ahead of the  
3 public auction by purchasing them through a city, township, or village effectively  
4 preventing homeowners from bidding on and re-purchasing their property. Also  
5 require the Oakland County Treasurer to create rules that place harsh penalties of  
6 \$100,000 per parcel on cities and private corporations that collude to transfer  
7 properties ahead of the public auction;  
8  
9

10 Enjoining the Defendants in this lawsuit to return Plaintiff to the position she  
11 was in before her life and property was touched by this conspiracy and as a result  
12 of the unspeakable harms the Defendants visited upon the Plaintiff that this  
13 honorable Court award treble exemplary and compensatory damages allowable  
14 under MCL 600.2918 and MCL 600.2919(a).  
15  
16

17 Enjoining the Oakland County Treasurer to take all necessary and appropriate  
18 steps to correct the continuing effects of their past and present discriminatory  
19 practices;  
20  
21

22 Requiring such action by the Oakland County Treasurer and Southfield  
23 Defendants as may be necessary to restore Plaintiff, as an aggrieved party to the  
24 Defendants discriminatory housing practices, to the position Plaintiff would have  
25 occupied but for such discriminatory conduct; and  
26  
27  
28

1       Requiring Defendant OAKGOV to reverse the tax foreclosure against Plaintiff  
2       at no cost as a result of the illegal actions outlined above in this conspiracy and  
3  
4       provide marketable title free of encumbrances post-haste to Plaintiff,

5       Requiring Defendant corporations and SNR to provide an immediate forensic  
6       accounting to the Court of all monies received and expended to any employees,  
7       agents, or contractors related to Plaintiff's and the other 116+ properties  
8  
9       transferred to SNR, SFIELD, and NON-PROFIT in 2016, 2017, and 2018,  
10

11       Requiring NON-PROFIT to provide documentation of all property sales and  
12       distributions of monies, properties, and contracts related to the 2016, 2017, and  
13       2018 property transfers; and to rescind and revert all transfers that constitute  
14  
15       improper self-dealing, wasting charitable assets, or violating the Internal Revenue  
16       Code where NON-PROFIT and other named Defendants' board members,  
17       officials, employees, and agents benefitted from private and personal inurements  
18  
19       that were not properly disclosed to the IRS under 501 c3 rules related to the  
20       disposition of assets by NON PROFIT to any employees, agents, board members,  
21       or other named Defendants.

22  
23       Requiring Defendant OAKGOV to immediately discontinue the policy of  
24       transferring tax foreclosed properties to private corporations in contravention of  
25  
26       Michigan (MCLA § 213.23(2) ) law;  
27  
28

1 Requiring an immediate injunction on Defendant SFIELD and all of its  
 2 officials, agents, and employees including the Mayor, City Administrator, City  
 3 Attorney, City Council Members, Treasurer, Code Enforcement, and Clerk;  
 4 Oakland County Habitat for Humanity; the NON-PROFIT and its officials, agents,  
 5 and employees; SNR and its officials, agents and employees, M. S. Title Agency,  
 6 LLC. and its officials, agents and employees, and GTJ Consulting, LLC. and JBS  
 7 Disposal, LLC. requiring them to cease usurping the rights of African-American  
 8 Southfield residents to bid on properties at the public auction and repurchase their  
 9 homes at the true cost of the taxes owing plus fees as allowable under Michigan  
 10 law;  
 11  
 12  
 13  
 14

- 15 1. Compelling Defendant OAKGOV and all other Defendants to return
- 16 Plaintiff's property to the tax roles by any means necessary; and
- 17
- 18 2. Compensatory and exemplary damages to be paid to Plaintiff, according to
- 19 proof at trial;
- 20
- 21 3. Punitive damages as the court deems appropriate;
- 22
- 23 4. Costs and attorneys fees of this lawsuit, with interest;
- 24
- 25 5. Any other relief as the court deems appropriate.

26 **PLAINTIFF HEREBY DEMANDS A JURY TRIAL OF THIS**  
 27 **MATTER ON ALL ISSUES SO TRIABLE**  
 28

1  
2 Plaintiff, Marion Sinclair, pursuant to MCR 2.508, demand a trial by jury in  
3  
4 the above-captioned matter.

5 Respectfully submitted,

6  
7 2/8 /2019

MARION SINCLAIR



PROSE Plaintiff

25523 Grodan Dr., Apt 220

Southfield, MI 48033

313-970-1259

Plaintiff email address: N/A

# EXHIBIT

# 1

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING & REGULATORY AFFAIRS  
MICHIGAN ADMINISTRATIVE HEARING SYSTEM  
MICHIGAN TAX TRIBUNAL  
SMALL CLAIMS DIVISION

Marion Sinclair,  
Petitioner,

v

MTT Docket No. 411863

City of Southfield,  
Respondent.

Tribunal Judge Presiding  
Kimbal R. Smith, III

FINAL OPINION AND JUDGMENT

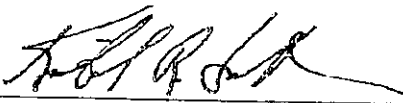
The Tribunal, having given due consideration to the file in the above-captioned case, finds:

1. The Tribunal issued a Proposed Opinion and Judgment on July 18, 2011. The Proposed Opinion and Judgment states, in pertinent part, "[t]he parties have 20 days from date of entry of this Proposed Opinion and Judgment to file any written exceptions to the Proposed Opinion and Judgment."
2. Neither party has filed exceptions to the Proposed Opinion and Judgment.
3. The Tribunal adopts the Proposed Opinion and Judgment as the Tribunal's final decision in this case. See MCL 205.726.

IT IS SO ORDERED.

MICHIGAN TAX TRIBUNAL

Entered: **OCT 19 2011**  
ndg

By 

**STATE OF MICHIGAN  
DEPARTMENT OF LICENSING & REGULATORY AFFAIRS  
MICHIGAN ADMINISTRATIVE HEARINGS SYSTEM**

Marion Sinclair,  
Petitioner,

MICHIGAN TAX TRIBUNAL  
SMALL CLAIMS DIVISION  
MTT Docket No. 0411863

v

City of Southfield,  
Respondent.

Case Type: Poverty Exemption

**PROPOSED OPINION AND JUDGMENT**

Personnel Presiding:	Thomas S. Fredericks, Hearing Referee
Location of Hearing:	Oakland County Equalization Dept.
Date of Hearing:	June 8, 2011
Petitioner's Representative:	Marion Sinclair
Respondent's Representative:	Failed to Appear

**PROPOSED JUDGMENT**

The subject property is entitled to a poverty exemption pursuant to MCL 211.7u of 100% for the tax years at issue. As such, the subject property's taxable value (TV) for the tax years at issue shall be as follows:

**Parcel Number:** 76-24-25-108-006

Year	TV
2010	\$0.00

**PROCEDURAL HISTORY**

Petitioner applied to the local Board of Review for a poverty exemption on July 20, 2010, and filed this appeal with the Tribunal on September 1, 2010.

Petitioner has not submitted any documentation or otherwise indicate that she requested a poverty exemption from Respondent's March 2011 Board of Review and, as such, the property's assessment for purposes of considering the granting of a poverty exemption for the 2011 tax year is not included in this proceeding, as provided by MCL 205.737(5)(b).

**ISSUES AND APPLICABLE LAW**

The issues in this matter are:



**MTT Docket No. 0411863**

**Proposed Opinion and Judgment, Page 2 of 5**

Whether Petitioner's property qualifies for a property tax exemption due to reasons of poverty exemption pursuant to MCL 211.7u.

"In general, tax exemption statutes are to be strictly construed in favor of the taxing authority." *Michigan United Conservation Clubs v Lansing Twp*, 423 Mich 661, 664; 378 NW2d 737 (1985); *Ladies Literary Club v Grand Rapids*, 409 Mich 748, 753-754; 298 NW2d 422 (1980). The petitioner must prove, by a preponderance of the evidence, that it is entitled to an exemption. *ProMed Healthcare v Kalamazoo*, 249 Mich App 490; 644 NW2d 47 (2002).

MCL 211.7u provides in pertinent part:

- (1) The principal residence of persons, who, in the judgment of the supervisor and board of review, by reason of poverty, are unable to contribute toward the public charges is eligible for exemption in whole or in part from taxation under this act. This section does not apply to the property of a corporation.
- (2) To be eligible under this section, a person shall do all of the following on an annual basis...
  - (e) Meet the federal poverty guidelines updated annually in the federal register by the United States department of health and human services under authority of section 673 of subtitle B of title VI of the omnibus budget reconciliation act of the 1981, Public Law 97-35, 42 U.S.C. 9902, or alternative guidelines adopted by the governing body of the local assessing unit provided the alternative guidelines do not provide income eligibility requirements less than the federal guidelines.

**SUMMARY OF EVIDENCE**

**A. Petitioner's Evidence**

Petitioner's Contentions of TCV, SEV and TV:

**Parcel Number:** 76-24-25-108-006

Year	TCV	SEV	TV
2010	N/A	N/A	\$0.00

Petitioner offered the following exhibits:

1. Property Tax Appeal Form.
2. Letter received on April 7, 2011.
3. Board of Review Decision.

**MTT Docket No. 0411863**

**Proposed Opinion and Judgment, Page 3 of 5**

4. Notice of Property Tax Forfeiture.
5. 2010 IRS 1040 Income Tax Return.

Based on the pleadings, the admitted exhibits, and sworn testimony, if any, Petitioner claims that she is entitled to a poverty exemption.

**B. Respondent's Evidence**

The property's TCV, SEV and TV, as confirmed by Board of Review, for the tax years at issue:

**Parcel Number: 76-24-25-108-006**

Year	TCV	SEV	TV
2010	\$59,790	\$29,895	\$40,980

Respondent offered the following exhibits which were admitted into evidence unless indicated otherwise:

1. Property record card.
2. Board of Review Decision
3. Poverty Exemption Worksheet.
4. City of Southfield Application for Homestead Property Tax Relief

Based on the pleadings, the admitted exhibits, and sworn testimony, if any, Respondent claims that Petitioner is not entitled to a poverty exemption.

**FINDINGS OF FACT**

The following facts were proven by a preponderance of the evidence:

1. The subject property is located at 17357 New Hampshire Drive in the county of Oakland, is classified as residential real and has a principal residence exemption of 100% for the tax years at issue.
2. Petitioner is an owner of the subject property.
3. The number of persons residing in the subject household for the year at issue was one.
4. The "federal poverty guidelines" or alternative guidelines adopted by Respondent for the subject household for the tax year at issue provide for an income level of \$ 12,960. Petitioner's annual household income pursuant to MCL 211.7u for the years at issue is \$ 8,967.
5. Respondent has adopted an "asset test" that provides for the maximum value household assets of \$ 30,000 and the value of Petitioner's household assets is less than \$ 30,000.

MTT Docket No. 0411863

Proposed Opinion and Judgment, Page 4 of 5

### CONCLUSIONS OF LAW

1. Petitioner has proven, by a preponderance of the evidence, that the subject property is qualified to receive a poverty exemption, under MCL 211.7u, for the tax years at issue.
2. The following authority and reasoned opinion supports this burden of proof determination:

Petitioner submitted affirmative evidence to establish or, more appropriately, verify her income and assets for the 2010 tax year. Both her income and assets qualify her for a poverty exemption under Respondent's guidelines for the 2010 tax year.

3. Based upon the findings of fact and conclusions of law, the property's poverty exemption for the tax years at issue is as listed in the Proposed Judgment Section of this Proposed Opinion and Judgment.

### EXCEPTIONS

This Proposed Opinion and Judgment (POJ) was prepared by the Michigan Administrative Hearings System. The parties have 20 days from date of entry of this POJ to notify the Tribunal in writing if they do not agree with the POJ and state in writing why they do not agree with the POJ (i.e., exceptions). The exceptions are *limited* to the evidence submitted prior to or at the hearing and any matter addressed in the POJ. There is no fee for filing exceptions.

A copy of a party's written exceptions *must* be sent to the opposing party and the opposing party has 14 days from the date the exceptions were sent to that party to file a written response to the exceptions.

After expiration of the time period for the opposing party to file a response to the exceptions, the Tribunal will review the case file, the POJ, the exceptions and responses, if any, and:

- a. Issue a Final Opinion and Judgment adopting the POJ as a Final Decision.
- b. Issue a Final Opinion and Judgment modifying the POJ and adopting the Modified Proposed Opinion and Judgment as a Final Decision.
- c. Issue an Order vacating the POJ and ordering a rehearing or such other action as is necessary and appropriate.

Date Signed:

By



**MTT Docket No. 0411863**

**Proposed Opinion and Judgment, Page 5 of 5**

Date Entered by Tribunal: **JUL 18 2011**

APPROVED FOR  
STATE OF MI  
IN THE UNITED STATES  
COURT  
IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
MARION SINCLAIR  
PROSE  
ANDY MILLER  
CIVIL ACTION NO.

SOUTHERN  
DISTRICT OF  
NEW YORK  
WEISS  
JULIA

Helping Michigan's Hardest-Hit Homeowners  
Ask step forward when you're at a loss

Decline Notification

March 4, 2014  
Marion Sinclair  
17357 New Hampshire Dr  
Southfield, MI 48075

MHA Case Number: 84573  
Mortgage Account Number:

Dear Marion Sinclair

Step Forward Michigan has reviewed your application for all programs offered through Michigan's Hardest Hit Funds®. At this time we have determined you to be ineligible for assistance for the following applicable reason(s):

Acquired property without the ability to sustain payments.

If you have any program questions, please refer to the FAQ (Frequently Asked Questions) on our web site at [www.stepforwardmichigan.org](http://www.stepforwardmichigan.org). If you believe you have been wrongfully denied assistance, please refer to Contact Us on our web site.

If your circumstances change, you may reapply for the Hardest Hit Funds® program on our website by clicking LOGIN. You must update your information before printing and submit the updated application with all supporting documentation necessary to overturn the declination reasons.

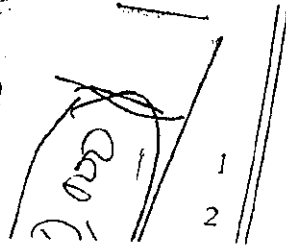
Michigan Homeowner Assistance Nonprofit Housing Corporation (MHA) is acting through the Michigan State Housing Development Authority



Michigan Homeowner Assistance Nonprofit Housing Corporation (MHA)  
Step Forward Michigan  
George W. Romney Building - 8th Floor • 111 S. Capitol Ave. • Lansing, MI 48933  
Phone (866) 946-7432 • Fax (517) 636-6170  
[www.stepforwardmichigan.org](http://www.stepforwardmichigan.org)



No. 1 filed 07/27/18  
 NC # 11558  
 STATE OF MICHIGAN  
 UNITED STATES  
 EASTER



IN THE



Re: [unclear] [unclear]

Step Forward # from Joanne  
 866-946-7432  
 to check status of ap

Joanne Hall <sup>brockline</sup> ~~brockline~~  
 248-858-5407  
 Community & Home Improvement, Oakland County  
 250 El Gato Lake Rd  
 Suite 1900  
 Pontiac MI 48341  
 (248) 858-1891

Filed ap for Step Forward  
 F9-5-14

Spoke w/Carlos at Step Forward  
 refile update hardship letter  
 what happened causing non paynt

FIELD  
 COUNTY  
 EASTER

# EXHIBIT

2/16



## SOUTHFIELD HOME IMPROVEMENT PROGRAM

26000 Evergreen Road, Southfield, MI 48076  
(248) 796-4177 or FAX (248) 796-4105

July 26, 2016

Dear Southfield Home Improvement Program Applicant:

Your name is within the top five on the waiting list and I will be contacting you to schedule an interview after receiving the application. **Focus of repairs will only be roof, furnace, hot water tanks, and electrical hazards.**

In order to prepare your application for processing, please gather the following materials to be submitted at the time of your interview. **Please complete the enclosed application and mail it back by or before Friday, August 5, 2016.**

### **PROOF OF INCOME**

1. Copies of the most recent federal income tax returns and W-2 for every adult household member.
2. Copies of three recent paycheck stubs for each employed member of the household.
3. In cases of self-employment, submit copies of income tax returns from the past two years.
4. Copies of documents which verify any monthly benefits that household members may receive such as pension or social security payments.

### **PROOF OF OWNERSHIP**

1. A copy of your Warranty Deed or Quit Claim Deed.

### **PROOF OF INSURANCE**

1. A copy of your homeowners insurance statement verifying that your insurance is current.

### **PROOF OF ASSETS**

1. Copies of the most recent monthly statements for checking and savings accounts.
2. Copies of written reports which verify any other assets that household members may own such as an IRA, stocks, or bonds.
3. Copy of appraisal done on the home if one has been completed within the last three years.

### **VERIFICATION OF MORTGAGE**

1. A copy of the most recent monthly statement or payment stub.

### **CREDIT REPORT**

1. A copy of your credit report from one of the credit bureau.

**Please bring these items with you to the interview.**

***If you are no longer interested in the Southfield Home Improvement Program or if you need assistance, please feel free to call me at (248) 796-4177.***



Marion Sinclair  
17357 New Hampshire Dr

p 1 of 2

Southfield MI 48075

Nov. 3, 2015 ~~October 28, 2015~~  
(313) 970-1259

Mr. Ken Siver, Mayor To Be  
18410 Magnolia Pkwy  
Southfield MI 48075

Mayor  
Dear Mr. Siver,

I spoke with you as I was entering  
my driveway on New Hampshire, a dead  
end street. I told you I planned to  
vote for you.

You <sup>were</sup> ~~are~~ busy with your campaign,  
I know. Maybe <sup>since</sup> ~~after~~ election you can  
help me. If things continue on the path  
they're going, my home will be taken in 2016.

I am 70 and will be 71 in December 2015.  
Over \$23,000 is owed in property taxes.  
And, my roof won't make it over the  
winter. I've tried agencies but no help.  
Recently, I tried Reverse Mortgage and it  
fell through. They said the \$72,000 appraisal  
needs to be at least \$125,000.

11-~~3~~-15  
~~10-28-15~~ p 2 of 2  
Marion Sinclair

I don't want to leave. Please guide me.

Thank you for your help.

Sincerely

Marion

Congratulations!!

Mayor Siver, much success ahead.

Marion Sinclair  
17357 New Hampshire Dr  
Southfield MI 48075  
(313) 970-1259  
July 11, 2016

Page 1 of 5

Mayor Ken Siver  
City of Southfield  
18410 Magnolia Pkwy  
Southfield MI 48075

Dear Mayor Siver,

I wish I didn't need to bother you again;  
Unfortunately, here I am again, trying to save my home.  
It seems like a no win for me, but I'm still  
trying one more time.

Southfield has or is taking over my home from  
Andrew Meisner and his crew, Jody DeFoe and  
Christy Howard. It is my understanding they will  
renovate and sell it, possibly through Habitat  
for Humanity.

I have spoken with Mr. Dick Lampi. He said my  
home is on the list of houses Southfield will be  
taking possession of, and they will be sending notices

Marion Sinclair July 11, 2016 Page 2 of 5

within a week or two. Before Meisner foreclosed on my home, Mr. Lampe said he would have my roof repaired if I could get a payment plan with Andrew Meisner. Why can't some arrangement be made with Southfield.

Someone thought Habitat For Humanity may get the houses. It doesn't matter who gets possession. If it's going to be repaired, why can't it be done for me.

Once repaired, I can get a reverse mortgage. I have contacted several. Give me 1 1/2 years to arrange for timely payment of taxes through the loan. They have a program available that will pay taxes and insurance through their agency. If there's any problem, I will walk away knowing I was given a real chance to keep my home. Single and 71, how will I be able to purchase another home if this one is taken from me?

Southfield has programs to aide homeowners, why not me? Why replace one person in need with another? It's not as if I've never paid

Marion Sinclair July 11, 2016 Page 3 of 5

property taxes in Michigan. When I owned a home in Detroit, I did. Step Forward Michigan refused my request. They said I never paid taxes. Maybe I didn't here, but I did in Detroit from 1974-2007. Occasionally I had problems, however, when employed payments were resumed.

Once you tried to help me get my roof repaired through Mr. Lampe. I have been trying to get the roof repaired for a while. in order to qualify for a reverse mortgage. At one time, 11-13-14, I was supposed to be last on a list of about 20 homeowners requesting assistance. I spoke with Ms. Lorna, 248-796-4177. Nothing came of that contact.

With one reverse mortgage application, there was even a HUD appraisal. It fell through in September 2016 because of the roof. County taxes were going to be paid through that program and I wouldn't be in this mess.

Since Southfield has a program to repair homes to keep residents in their home, why

Marion Sinclair July 11, 2016 Page 4 of 5  
 can't. They repair mine. Where is the  
 assistance for me, a 71 year old female?

If Habitat For Humanity gets control of my  
 home, they help those in need. I'm in need,  
 I'm already here, and don't want to  
 leave if I don't have to. Why, Mr. Siver,  
 can't I be the one helped? I've been  
 here 7½ years.

In June I was frightened by a company  
 breaking locks off my door. They were told  
 by Misner's group that the property was  
 vacant. They were going to put a lock box  
 on the door. I was in bed and scared. Oakland  
 County sent me no correspondence after  
 foreclosure. I have spoken with Andrew  
 Misner and he hates me although he has  
 never met me face to face.

Thank you for referring me to possible  
 housing relocation, but the so called  
 example I was shown at McDonnell was



Marion Sinclair July 11, 2016 Page 5 of 5

like a small prison cell. It was claustrophobic  
there was hardly enough room to turn around  
in.

Will you look into my situation, again;  
and see if anything can be done to keep me  
in my home?.

Enclosed is a letter sent to Andrew Weisner  
and a copy was sent to Judge Nancy J. Grant  
I received no response

Somebody, somewhere can help me out. I  
hope it's you.

I realize you're very busy with matters of  
the City and I'm just a small pebble  
in the rock pile. Please pick me up.

Thank you Mayor Siver for everything,

Marion

Copies enclosed

Marion Sinclair  
17357 New Hampshire Dr.  
Southfield MI 48075  
(313) 970-1259

Page 1 of 6

~~July 29, 2016~~ August 4, 2016

Mr. Ken Siver  
Mayor of Southfield  
and  
Mr. Fred Zorn  
City Administrator of Southfield  
18410 Magnolia Pkwy  
Southfield MI 48075

Dear Mayor Siver and Administrator Zorn,

Thank you for coming to my home to see if  
anything can be done to rectify my situation. You are  
the only ones who cared enough to investigate my  
problem.

I understand what you said about needed <sup>repairs</sup> to  
make the house whole. Those improvements are going  
to be made and someone will get the house.  
Again, I ask, why not me? It's not going to be  
torn down.



Marion Sinclair

~~July 29~~ 2016

Page 2 of 6

Gentlemen, I'm asking that you make me a human project. You have many wealthy friends. How about a donation account where money can be sent to pay taxes, insurance, and repairs, like they do on "go fund me."

Once that is done, I can get a reverse mortgage. They have a program that will pay future taxes and insurance through their agency. There would be no more problems with taxes. I realized there are ridiculous fees for reverse mortgages, but I'm losing the house anyway and getting nothing.

At least with a reverse mortgage, I get some benefit from the home and a place to live. Walking away now, I get zero. I owe no mortgage. Your knowledge and expertise are needed to keep me here. You can do it, I cannot.

Even to move, I need money for movers, storage, first and last month's rent, furniture cleaning for mold, and other necessities. How do I get that done with nothing coming from the home? It is all I have.

Marion Sinclair July 19, 2016

Page 3 of 6

You are Southfield's Finest, The Creme of The Crop, The Elite. Who better can I go to than you? If I am to stay here, you two are whom I must rely. Please gentlemen make it happen.

I'm asking, Mayor Silver and Administrator Zorn, who do I turn to if not you?

I like it here and don't want to move. A high rise is not for me. My home is a good size for me, not too large, not too small. Neighbors are wonderful; we look out for each other. It's peaceful and I like living at the end of the block. I told them about my situation and they are praying for me.

Make this another beautiful Southfield home. When I got this house, I said, "This house looks like nobody loved it." Inside it was an ugly mess. Paint and new carpet made it liveable. When the roof leak was discovered, there was no money left for replacement. I put in those big beautiful plants on the side of the house toward Southfield Road myself.

Marion Sinclair <sup>August 29<sup>th</sup></sup> July 27, 2016

Page 4 of 6

Attempts have been made to get roofing done. After several reverse mortgage contacts, denied due to the needed roof repair and Step Forward Michigan denial, I am still trying. Southfield and Oakland agencies have also been contacted.

Finally, I am in contact with you two gentlemen who can keep me at home. You have the power. You have the means. Please make an extra extra effort.

Even though I am a 71 year old single female, I don't want to be packed, like sardines, in a high rise, seeing only old people like me. Let me live these last years in the world, with a lawn, trees, plants, peace and quiet, with young and old. I want to come and go as I please, have room for family and friends to visit.

People keep telling me there is help out there for me; I can't tell. Charity organizations haven't worked for me. Once I purchased a book which guaranteed assistance by contacting those listed. After sending many letters, all were refusals. It's as if donations go to top

Marion Sinclair "July 27, 2016" Page 3 of 6  
 August 4,  
 organization executives and not enough to those  
 designated. The book was such a scam; I  
 later received a small cash settlement. The  
 government filed a class action suit against  
 them.

What is wrong with me? Why must someone  
 else get my home? Because I'm not wealthy,  
 I don't deserve to have a home? It's done for  
 others. Once again, I ask, why not me?

Yesterday, July 28, I received an application  
 from Southfield Home Improvement Program.  
 A copy is enclosed. A reply is requested by  
 August 5, 2016. I don't even know who owns  
 my home. What do you want me to do with  
 the application? I have no insurance.

I realize you are very busy men. It is not easy  
 running a big city. Have it in your hearts,  
 Mr. Sier and Mr. Zorn to help me. Don't put  
 me out. Help me stay. Please. I know you  
 can. Don't make this another dead end for me.  
 It's not necessary for me to seek "Help me  
 Hank" or "Charlie LaDuff" I have two men, you,  
 who can make it happen.

Marion Sinclair ~~July 11, 2016~~

Page 6 of 6

Maybe I can move to Woodbridge while work is being done to the house. It will be wonderful feeling proud to come home.

With Sincere Thanks

Marion

Copies enclosed

Marion Sinclair Page 1 of 4  
17357 New Hampshire Dr  
Southfield MI 48075  
June 2, 2016  
(313) 970-1259

Andrew E. Meisner  
Oakland County Treasurer  
1200 N. Telegraph Rd  
Bldg 12E, First Floor  
Pontiac MI 48341

Andrew Meisner:

You have taken my home. You and your  
duo, Jody Weissler DeToe backed up by  
Christy Howard, I believe, are racists.  
I don't believe you three would have  
spoken to or treated a 71 year old  
white person the way you have done me.

When I finally had a chance to repair  
my house and get a reverse mortgage to  
pay your taxes, you refused my request.  
You even hung up on me. When I visit  
your office, I only see a few Black people  
working there. I can't remember seeing  
more than 2. So, why should you help  
this one save her home?



Marion Sinclair B-2-16 page 2 of 4

You and your agency say you want to save our homes. You appear to be liars. How am I supposed to pay \$1700, plus over \$8000, plus over \$750 monthly. You know my income is \$813 a month. Save my home, RIGHT! How can you save my home like that?

As long as I dealt with other representatives in your office, things moved along. My mistake was requesting contact with you after meeting with DeFoe. She jacked payments up from \$50 monthly to \$170. This is the first year I fell behind in payments.

On my last attempt to meet and save my home, Howard talked to me in front of everyone in the waiting room and other employees. All could hear our conversation. She stated my situation for anyone to hear, including your refusal to grant me a payment plan.

Howard told me I could contact Judge Nanci Grant, stating "She may have sympathy for you." There was no

Marion Sinclair 6-2-16 page 3 of 4

respect. She only gave me the info for possible help after I asked for it.

How can you say you want to keep us in our homes when you are doing everything you can to put me out?

It's a shame you are in that position. You don't deserve it. Your workers, DeFre and Howard, can only be as good and compassionate as you. When it comes down to it, you are the boss, the leader. Those two follow your example. Maybe one day, as Howard said to me, you'll need someone's "sympathy" and feel what I feel now.

Well, Congratulations, King Meisner! One down. How many more to go?

I don't hate you. I just wish someone held that position who really wants to help ALL people in their county stay in their homes. Obviously, I'm not one of those people. However, that's life. Yours is one more hurdle I must learn to overcome to be there too.



Marion Sinclair 6-2-16 page 4 of 4

people like you, DeFoe, and Howard,  
all over the world. Too bad one  
of the other reps I have dealt  
with don't have your position.

Regretfully,

Marion Sinclair

Note

I am a human being. Treat me like one  
you sent men to change locks on ~~the~~ doors.  
You said ~~my~~ home was vacant. They were from  
Property Preservation Specialists, GTJ,  
800-385-0563, [www.GTJonline.com](http://www.GTJonline.com). If they  
would you do that. Auctions are in  
August 2016. Now I find it's moved up to July 19,  
2016. They said I'm the second home today  
that was occupied but was listed vacant.  
You're not a very good man Mr. Andrew  
"Ebenezer Scrooge" Meisner. Maybe someday  
something like this will happen to you.  
Miss Christy Howard wouldn't even give  
me the courtesy of speaking with me today  
6-2-16. Like boss, like representatives.

# EXHIBIT

3/6



**ANDREW E MEISNER**  
**OAKLAND COUNTY TREASURER**  
 1200 NORTH TELEGRAPH ROAD, PONTIAC, MICHIGAN 48341

Parcel Identification No: 76 24-25-108-006

Taxpayer: MARION SINCLAIR

Property Address: 17357 NEW HAMPSHIRE DR SOUTHFIELD MI 48075-2754

**Property Description:**

TIN,R10E,SEC 25 203-4 SOUTHAMPTON SUB. LOTS 203 & 204

**Taxable Value:** \$31,450

**Statement**

**Statement No:** 5080

**Page:** 1 of 1

**Date:** January 28, 2016

**Tax Payments:**

Year	Due			Sale No.	Status
	Tax	Interest & Fees	Total		
2007	\$0.00	\$0.00	\$0.00		Paid
2009	\$2,430.78	\$2,892.77	\$5,323.55		Withheld-Extension Granted. Partial Payments allowed.
2010	\$1,624.05	\$1,776.61	\$3,400.66		Withheld-Extension Granted. Partial Payments allowed.
2011	\$2,787.70	\$2,367.65	\$5,155.35		Withheld-Extension Granted. Partial Payments allowed.
2012	\$2,522.01	\$1,711.76	\$4,233.77		Withheld-Extension Granted. Partial Payments allowed.
2013	\$2,505.06	\$1,251.03	\$3,756.09		Delinquent - partial payment allowed
2014	\$2,558.22	\$424.32	\$2,982.54		Delinquent - partial payment allowed
Total			\$24,851.96		
Statement Total			<b>\$24,851.96</b>	If paid in February	

RC

MARION

SINCLAIR

17357 NEW HAMPSHIRE DR

SOUTHFIELD MI 48075-2754

(248) 858-0612

12/26/2018

Record Details | City of Southfield | BS&amp;A Online

**17357 NEW HAMPSHIRE** SOUTHFIELD, MI 48075 (P: Property Address)

Parcel Number: 76-24-25-108-006



1 Image / 1 Sketch

**Property Owner:** SOUTHFIELD NEIGHBORHOOD REVITALIZAT**Summary Information**

## &gt; Residential Building Summary

Assessed Value: \$0  
 Taxable Value: \$0  
 State Equalized Value: \$0  
 Date of Last Name Change: Not Available

&gt; 25 Invoices Found, Amount Due: 24.00

&gt; Assessed Value: \$0 | Taxable Value: \$0

&gt; Property Tax information found

&gt; 24 Building Department records found

**Owner and Taxpayer Information****Owner**

SOUTHFIELD NEIGHBORHOOD  
 REVITALIZAT  
 19785 W 12 MILE RD # 404  
 SOUTHFIELD, MI 48076

**Taxpayer**

SEE OWNER INFORMATION

**General Information for Tax Year 2018**

<b>Property Class</b>	401 - RESIDENTIAL	<b>Unit</b>	76 CITY OF SOUTHFIELD
<b>School District</b>	Southfield	<b>Assessed Value</b>	\$0
<b>MAP #</b>	No Data to Display	<b>Taxable Value</b>	\$0
<b>USER NUM IDX</b>	0	<b>State Equalized Value</b>	\$0
<b>USER ALPHA 1</b>	Not Available	<b>Date of Last Name Change</b>	Not Available
<b>USER ALPHA 3</b>	Not Available	<b>Notes</b>	Not Available
<b>Historical District</b>	Not Available	<b>Census Block Group</b>	Not Available
<b>USER ALPHA 2</b>	Not Available	<b>Exemption</b>	No Data to Display

**Principal Residence Exemption Information****Homestead Date** 02/21/2009

Principal Residence Exemption	June 1st	Total
2019	0.0000 %	-
2018	0.0000 %	0.0000 %

**Previous Year Information**

Year	Market Assessment	Total SA	Amount Owed
2017	\$0	\$0	\$0
2016	\$42,770	\$42,770	\$32,040
2015	\$41,090	\$41,090	\$31,950

**Land Information**

<b>Zoning Code</b>	Not Available	<b>Total Acres</b>	0.242
<b>Land Value</b>	\$0	<b>Land Improvements</b>	\$2,699
<b>Renaissance Zone</b>	No	<b>Renaissance Zone Expiration Date</b>	No Data to Display
<b>ECF Neighborhood</b>	425A NEIGHBORHOOD 25A	<b>Mortgage Code</b>	Not Available
<b>Lot Dimensions/Comments</b>	No Data to Display	<b>Neighborhood Enterprise Zone</b>	No

Width	Frontage	Depth
Lot 1	80.00 ft	132.00 ft
<b>Total Frontage: 80.00 ft</b>		<b>Average Depth: 132.00 ft</b>

**Legal Description**

TERMINUS CORP 17357 NEW HAMPSHIRE, SOUTHFIELD, MI 48076

**Land Division Act Information**

12/26/2018

Record Details | City of Southfield | BS&amp;A Online

<b>Date of Last Split/Combine</b>	<i>No Data to Display</i>	<b>Number of Splits Left</b>	0
<b>Date Form Filed</b>	<i>No Data to Display</i>	<b>Unallocated Div.s of Parent</b>	0
<b>Date Created</b>	<i>No Data to Display</i>	<b>Unallocated Div.s Transferred</b>	0
<b>Acreage of Parent</b>	0.00	<b>Rights Were Transferred</b>	<i>Not Available</i>
<b>Split Number</b>	0	<b>Courtesy Split</b>	<i>Not Available</i>
<b>Parent Parcel</b>	<i>No Data to Display</i>		

## Sale History

Sale Date	Allocation	Acres	City	County	Form of Sale	Refers to
09/22/2016	\$1.00	QC	CITY OF SOUTHFIELD	SOUTHFIELD NEIGHBORHOOD REVITALIZAT	NOT REPRESENTATIVE	49872/878
07/07/2016	\$28,425.00	CTY	OAKLAND COUNTY TREASURER	CITY OF SOUTHFIELD	NOT REPRESENTATIVE	49564/616
02/03/2016	\$0.00	AFF	SINCLAIR, MARION	OAKLAND COUNTY TREASURER	COUNTY TAX SALE	49465/731
01/27/2009	\$1.00	QC	SINCLAIR, GEORGE	SINCLAIR, MARION	BEW/N RELATED ENTITY	40858/384
01/23/2009	\$7,000.00	CD	JS BANK	SINCLAIR, GEORGE	NOT REPRESENTATIVE	40863/891
02/26/2008	\$136,740.00	SD	SMALLWOOD, KENNETH & LILLIAN	US BANK	SHERIFF'S DEED	40042/821
05/22/2003	\$100.00	QC	SMALLWOOD, KENNETH & LILLIAN	KENNETH/ LILLIAN & MARK	BEW/N RELATED ENTITY	29783/159

## Building Information: 1666 sq ft RANCH (Residential)

## General

<b>Floor Area</b>	1,656 sq ft	<b>Estimated TCV</b>	\$79,114
<b>Garage Area</b>	280 sq ft	<b>Basement Area</b>	0 sq ft
<b>Foundation Size</b>	1,656 sq ft	<b>Year Remodeled</b>	1957
<b>Year Built</b>	1950	<b>Class</b>	C
<b>Occupancy</b>	Single Family	<b>Tri-Level</b>	No
<b>Effective Age</b>	32 yrs	<b>Heat</b>	Forced Hot Water
<b>Percent Complete</b>	0%	<b>Wood Stove Add-on</b>	No
<b>AC w/Separate Ducts</b>	No	<b>Water</b>	<i>Not Available</i>
<b>Basement Rooms</b>	0	<b>Sewer</b>	<i>Not Available</i>
<b>1st Floor Rooms</b>	0	<b>Style</b>	RANCH
<b>2nd Floor Rooms</b>	0		
<b>Bedrooms</b>	0		

## Area Detail - Basic Building Areas

Height	Foundation	Exterior	Area (sq ft)
1 Story	Slab	Brick	1,666 sq ft 1 Story

## Basement Finish

<b>Recreation</b>	0 sq ft	<b>Recreation % Good</b>	0%
<b>Living Area</b>	0 sq ft	<b>Living Area % Good</b>	0%
<b>Walk Out Doors</b>	0	<b>No Concrete Floor Area</b>	0 sq ft

## Plumbing Information

<b>3 Fixture Bath</b>	2	<b>Ceramic Tile Wainscoat</b>	1
-----------------------	---	-------------------------------	---

## Fireplace Information

<b>Exterior 1 Story</b>	1
-------------------------	---

## Garage Information

<b>Area</b>	280 sq ft	<b>Exterior</b>	Siding
<b>Foundation</b>	42 Inch	<b>Common Wall</b>	1.5 Wall
<b>Year Built</b>	1955	<b>Finished</b>	No
<b>Auto Doors</b>	0	<b>Mech Doors</b>	0

## Porch Information

<b>CCP (1 Story)</b>	112 sq ft	<b>Foundation</b>	Standard
----------------------	-----------	-------------------	----------

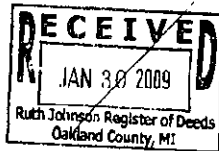
12/26/2018

Record Details | City of Southfield | BS&A Online

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LIBER 0858 PG 584



14600  
LIBER 40858 PAGE 584  
\$10.00 DEED - COMBINED  
\$4.00 REMUNERATION  
02/02/2009 08:18:45 A.M. RECEIPT: 7799  
PAID RECORDED - OAKLAND COUNTY  
RUTH JOHNSON, CLERK/REGISTER OF DEEDS

QUIT CLAIM DEED

The Grantor(s) George Sinclair, a single man

Whose address is 17537 Evergreen Detroit, MI 48219

Quit Claims to Marion Sinclair, a single women

Whose address is 17357 New Hampshire Drive, Southfield, MI 48075

The following described premises situated in the City of Southfield,  
Oak and County and State of Michigan:  
Lot(s) 203 And 204 Southampton Subdivision, According To The Plat There of As Recorded in Liber 35,  
Page 36, Oakland County Records.

35036

Commonly known as: 17357 New Hampshire Drive, Southfield, MI 48075

For the sum of \$ One and 00/100 Dollars (\$1.00)

EXEMPT UNDER MSA 7.456 (5) (a) MCL 207.52b (6)(a)

Subject to easements and building and use restrictions of record, if any.

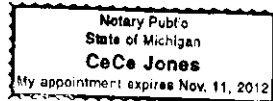
Dated: January 27, 2009

Signed in the presence of:

Signed by:

  
George Sinclair

State of Michigan  
County of \_\_\_\_\_

The foregoing instrument was acknowledged before me on Jan 30, 2009 by George Sinclair, a single man

Notary Public, County, Michigan  
My commission expires: Nov. 11, 2012

When recorded Return To:	Drafted By: George Sinclair
Marion Sinclair	
17357 New Hampshire Drive, Southfield, MI 48075	17537 Evergreen
	Detroit, MI 48219

Tax ID No 24-25-108-006 Recording Fee \_\_\_\_\_

State Transfer Tax \_\_\_\_\_  
County Transfer Tax \_\_\_\_\_

FEB 02 2009

O.K. - LG

# EXHIBIT

4 



Southfield Neighborhood Revitalization, LLC  
 C/O Mitchell Simon, Treasurer  
 24300 E. 14th Ave.  
 Southfield, MI 48033

7020

DATE 7-6-2016

PAY TO THE ORDER OF City of Southfield

Eight hundred thousand one hundred Fifty-Five <sup>95</sup>/<sub>100</sub>

\$ 800,155.95

DOLLARS & CENTS

FIFTH THIRD BANK

FOR DEPOSIT ONLY

*Indira Singh*

Posting Date 2016 Jul 07 Posting Check Number 2  
 Amount \$800,155.95

Posting Date 2016 Jul 07 Posting Check Num  
 Amount \$800,155.95

  
**FIFTH THIRD BANK**  
 (EASTERN MICHIGAN)  
 P.O. BOX 630900 CINCINNATI OH 45262-0900

SOUTHFIELD NEIGHBORHOOD  
 REVITALIZATION INITIATIVE LLC  
 19785 W 12 MILE RD #404  
 SOUTHFIELD MI 48076-2584



0

7114

Statement Period Date: 7/1/2016 - 7/31/2016  
 Account Type: 5/3 Bus Standard Ckg  
 Account Number: [REDACTED]

Banking Center: Southfield  
 Banking Center Phone: 248-353-3010  
 Business Banking Support: 877-534-2264

### Account Summary - [REDACTED]

31

<b>07/01 Beginning Balance</b>	<b>\$60.00</b>	Number of Days in Period
1 Checks	\$(800,155.95) ✓	
1 Withdrawals / Debits	\$(3.00)	
2 Deposits / Credits	\$810,500.00 ✓	
<b>07/31 Ending Balance</b>	<b>\$10,401.05</b>	

**Analysis Period: 06/01/16 - 06/30/16**

Standard Monthly Service Charge	\$11.00
<b>Standard Monthly Service Charge Waived</b> (see below)	<b>-\$11.00</b>
PAPER ACCOUNT STATEMENT FEE	\$3.00
<b>Service Charge withdrawn on 07/13/16</b>	<b>\$3.00</b>

**Standard Monthly Service Charge waived if:**

Your business maintains a total monthly average balance of \$3,500 across its business checking, savings, and certificate of deposit accounts.

**OR** your business spends at least \$500 per month on its business credit card.

**Current Relationship Overview:**

**Balance Criteria Met?** **No**  
 Total Combined Monthly Average Balance \$60.00

**Other Criteria Met?** **No**

\$500 Business Credit Card Spend?

1 check totaling \$800,155.95

#### Check

\* Indicates gap in check sequence    i = Electronic Image    s = Substitute Check

Number	Date Paid	Amount
21	07/07	800,155.95

1 item totaling \$3.

#### Withdrawals / Debits

Date	Amount	Description
07/18	3.00	SERVICE CHARGE

2 items totaling \$810,500

#### Deposits / Credits

Date	Amount	Description
07/01	810,500.00	DEPOSIT
07/08	810,500.00	DEPOSIT

Amount	Date	Amount
10,401.05	07/13	10,401.05

# EXHIBIT

# 5

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING & REGULATORY AFFAIRS  
MICHIGAN ADMINISTRATIVE HEARING SYSTEM  
MICHIGAN TAX TRIBUNAL  
SMALL CLAIMS DIVISION

Marion Sinclair,  
Petitioner,

v

MTT Docket No. 411863

City of Southfield,  
Respondent.

Tribunal Judge Presiding  
Kimbal R. Smith, III

CORRECTED FINAL OPINION AND JUDGMENT

A Final Opinion and Judgment was entered in the above-captioned case on October 19, 2011. On November 4, 2011, Respondent requested the Tribunal to make a correction to that Final Opinion and Judgment. In support of its request, Respondent states as follows:

- a. "We believe that reducing a taxable value to \$0 would violate the intentions of the Southfield City Council guidelines to provide partial relief from property tax responsibility. Their right to establish partial exemptions is found in MCL 211.7u(1)...."
- b. "[T]he new taxable value should be set at 15,260 for 2010. This calculation was derived by taking 10% of the annual income of \$8,001 (note the \$8,967 used by the Tribunal) and dividing it by the prior year's tax rate to determine this year's derived taxable value...."
- c. "The City of Southfield follows the city council guidelines and applies them uniformly to all applicants to arrive at a fair and equitable value based on the hardship."

The Tribunal, having given due consideration to the case file, finds that the Hearing Referee erred in awarding Petitioner a 100% poverty exemption for the 2010 tax year, and further, that the Tribunal erred in adopting said determination as its final decision in the above-captioned case. Pursuant to MCL 211.7u(4), "[t]he

MTT Docket No. 411863

Corrected Final Opinion and Judgment, Page 2 of 3

governing body of the local assessing unit shall determine and make available to the public the policy and guidelines the local assessing unit uses for the granting of exemptions under this section. The guidelines shall include but not be limited to the specific income and asset levels of the claimant and total household income and assets." Respondent's adopted guidelines state that any "[a]pplicant is responsible for property taxes exceeding 15% of the household income....At no time will an applicant be granted a total exemption, therefore, applicant must be responsible for 15% of household income." Nonetheless, Respondent's 2010 Poverty Exemption Worksheet indicates that the Board of Review utilized a threshold of only 10% in determining Petitioner's exemption eligibility, though the same was denied in whole on other grounds, and in as much as MCL 211.7u(5) permits the Board to deviate from the adopted guidelines in instances where there are "substantial and compelling reasons," the Tribunal accepts the Board's determination in this regard. Further, and in light of this deviation, the Tribunal finds that the Board's calculations and the figures utilized therein are more reliable than those set forth in the Proposed Opinion and Judgment. As such, Respondent has shown good cause to justify the modifying of the Final Opinion and Judgment. As a result:

- d. The property's TV as established by the Board of Review for the tax year at issue is as follows:

**Parcel Number:** 76-24-25-108-006

Year	TV
2010	40,980

- e. The property's final TV for the tax year at issue is as follows:

**Parcel Number:** 76-24-25-108-006

Year	TV
2010	15,260

IT IS SO ORDERED.

IT IS FURTHER ORDERED that the officer charged with maintaining the assessment rolls for the tax years at issue shall correct or cause the assessment rolls to be corrected to reflect the property's poverty exemption and taxable value as

MTT Docket No. 411863

Corrected Final Opinion and Judgment, Page 3 of 3

finally provided in this Final Opinion and Judgment within 20 days of the entry of the Final Opinion and Judgment, subject to the processes of equalization. See MCL 205.755. To the extent that the final level of assessment for a given year has not yet been determined and published, the assessment rolls shall be corrected once the final level is published or becomes known.

IT IS FURTHER ORDERED that the officer charged with collecting or refunding the affected taxes shall collect taxes and any applicable interest or issue a refund as required by the Final Opinion and Judgment within 28 days of the entry of the Final Opinion and Judgment. If a refund is warranted, it shall include a proportionate share of any property tax administration fees paid and of penalty and interest paid on delinquent taxes. The refund shall also separately indicate the amount of the taxes, fees, penalties, and interest being refunded. A sum determined by the Tribunal to have been unlawfully paid shall bear interest from the date of payment to the date of judgment and the judgment shall bear interest to the date of its payment. A sum determined by the Tribunal to have been underpaid shall not bear interest for any time period prior to 28 days after the issuance of this Final Opinion and Judgment. Pursuant to MCL 205.737, interest shall accrue (i) after December 31, 2005, at the rate of 3.66% for calendar year 2006, (ii) after December 31, 2006, at the rate of 5.42% for calendar year 2007, (iii) after December 31, 2007, at the rate of 5.81% for calendar year 2008, (iv) after December 31, 2008, at the rate of 3.31% for calendar year 2009, (v) after December 31, 2009, at the rate of 1.23% for calendar year 2010, and (vi) after December 31, 2010, at the rate of 1.12% for calendar year 2011.

MICHIGAN TAX TRIBUNAL

By  \_\_\_\_\_Entered: DEC 28 2011  
ejg

12-13-4

STATE OF MICHIGAN  
DEPARTMENT OF ENERGY, LABOR & ECONOMIC GROWTH  
MICHIGAN TAX TRIBUNAL  
SMALL CLAIMS DIVISION

Marion Sinclair,  
Petitioner

v

MTT Docket No. 0411863

City of Southfield,  
Respondent

TRIBUNAL JUDGE PRESIDING  
Kimbal R. Smith III

**ORDER OF PARTIAL DISMISSAL**

The Tribunal, having given due consideration to the file in the above-captioned case, finds that (i) the underlying issue relates to the subject property's assessed and taxable values for the current tax year and prior tax years (ii) the Tribunal has no jurisdiction over the property's assessed and taxable values for tax years 2009 as the initial letter of appeal was not received prior to the tax year involved pursuant to MCL 205.735a, therefore,

IT IS ORDERED that this case is PARTIALLY DISMISSED relative to Petitioner's appeal of the subject property's assessed and taxable values for prior tax years 2009 only.

This appeal will continue for tax year 2010.

MICHIGAN TAX TRIBUNAL



ENTERED: 04/13/2011

# EXHIBIT

7/15



Approved  
April 25, 2016

REGULAR MEETING  
OF THE COUNCIL  
CITY OF SOUTHFIELD

February 29, 2015

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REGULAR MEETING

2

FEBRUARY 29, 2016

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REGULAR MEETING

13

FEBRUARY 29, 2016

The SNPNC has agreed to provide the initial seed capital in the amount of \$1,500,000. These funds will allow the City to facilitate the acquisition and form a joint entity between the City and the SNPNC to facilitate the renovation and sale of the properties.

Discussions ensued between Council and City Administrator Fred Zorn. Councilman Fracassi stated that in the past the city had purchased homes that were foreclosed and he does not believe that it was handled affectively. The City ended up hiring a real estate company to sell the homes. Councilman Fracassi stated that he does favor fixing up the homes that were tax foreclosed, but at the same time the City needs to have professional help. City Administrator Zorn stated that this program is working with a nonprofit and that there are items that still need to be worked out. This program will allow homes to be owner occupied and not have rentals. The City of Hazel Park runs a similar program where they renovate the property and sell it. In previous years, the City had HUD properties that had to turn away people due to having a higher annual income and with this program the City does not have to do that. Mr. Zorn stated that administration will have the lead in this program and may look into having a project manager.

It is recommended that Council approve the resolution authorizing the joint venture between the City of Southfield and the Southfield Non-Profit Housing Corporation, with the SNPNC providing the capital to finance the venture, allowing the City to acquire from the Oakland County Treasurer's office tax-foreclosed properties available in 2016 for the purpose of renovating and selling to owner occupants.

2016.42      Motion by Mandelbaum; seconded by Brightwell.

**RESOLVED:** That Council authorizes the joint venture between the City of Southfield and the Southfield Non-Profit Housing Corporation, with the SNPNC providing the capital finance the venture, allowing the City to acquire from the Oakland County Treasurer's office tax-foreclosed properties available in 2016 for the purpose of renovating and selling to owner occupants.

Motion passed.

Consent Item H. Receipts of bids on printing the *Southfield Living* Newsletter. Beginning in 2003, the Community Relations and Parks and Recreation Departments combined the former *Southfielder* newsletter with the Parks and Recreation Activities Booklet in an effort to save money on printing and postage costs. This change resulted in the new *Southfield Living* newsletter, which includes news and information on events sponsored by several departments. This change proved successful, yielding a savings of approximately \$58,000 as compared to the previous approach.

Approximately 42,000 issues of *Southfield Living* will be printed and distributed to every mailing address in the City and also available in City offices. The lowest acceptable bid was received from Woodward Printing Services of Platteville, Wisconsin in the amount of \$23,196.00 for two editions. The March, 2016 edition will be printed shortly, in fiscal year 2015-16, and the September, 2016 edition will occur in fiscal year 2016-17.

06/22/2016 1:38:59 PM -0400 DELEG FAXCOM

PAGE 7 OF 8

CSCUCD-541 (Rev. 08/15)

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU															
Date Received		(FOR BUREAU USE ONLY)													
		This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document													
<table border="1"> <tr> <td colspan="4">Name Joseph G. Couvreur, c/o Pentiuk, Couvreur &amp; Kobiljak, P.C.</td> </tr> <tr> <td colspan="4">Address 2915 Biddle Avenue, Suite 200</td> </tr> <tr> <td>City Wyandotte</td> <td>State Michigan</td> <td colspan="2">Zip Code 48192</td> </tr> </table>				Name Joseph G. Couvreur, c/o Pentiuk, Couvreur & Kobiljak, P.C.				Address 2915 Biddle Avenue, Suite 200				City Wyandotte	State Michigan	Zip Code 48192	
Name Joseph G. Couvreur, c/o Pentiuk, Couvreur & Kobiljak, P.C.															
Address 2915 Biddle Avenue, Suite 200															
City Wyandotte	State Michigan	Zip Code 48192													
			EXPIRATION DATE: DECEMBER 31.												

Document will be returned to the name and address you enter above.  
If left blank, document will be returned to the registered office.

### CERTIFICATE OF ASSUMED NAME

For use by Corporations, Limited Partnerships and Limited Liability Companies  
(Please read information and instructions on the last page)

Pursuant to the provisions of Act 284, Public Acts of 1972 (profit corporations), or Act 162, Public Acts of 1982 (nonprofit corporations), Act 213, Public Acts of 1982 (limited partnerships), or Act 23, Public Acts of 1993 (limited liability companies), the undersigned execute the following Certificate:

1. The name of the corporation, limited partnership, or limited liability company is:

Southfield Neighborhood Revitalization Initiative LLC

2. The identification number assigned by the Bureau is:

3. The assumed name under which business is to be transacted is:

Southfield NRI

4. This document is hereby signed as required by the Act.

COMPLETE ITEM 5 ON PAGE 3 IF THIS NAME IS ASSUMED BY MORE THAN ONE ENTITY.

Signed this 21 day of JUNE, 2016  
By Southfield Nonprofit Housing Corporation  
By Mitchell K. Simon (Signature)  
MITCHELL K. Simon (Type or Print Name)  
(Type or Print Title or Capacity)

(Limited Partnerships Only - Indicate Name of General Partner, if the General Partner is a corporation or other entity)

06/22/2016 1:39PM (GMT-04:00)

**MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS**  
**FILING ENDORSEMENT**

This is to Certify that the **CERTIFICATE OF ASSUMED NAME**

for


**SOUTHFIELD NEIGHBORHOOD REVITALIZATION INITIATIVE LLC**

**ID NUMBER: E8710X**

to transact business under the assumed name of

**SOUTHFIELD NRI**

received by facsimile transmission on June 22, 2016 is hereby endorsed.

Filed on June 24, 2016 by the Administrator.  


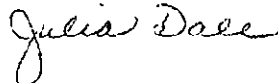
This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.

Expiration Date December 31, 2016



Sent by Facsimile Transmission

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 24th day of June, 2016.



Julia Dale, Director  
Corporations, Securities & Commercial Licensing Bureau

Vers 5.2/06/15)

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU  
LIMITED LIABILITY COMPANY ANNUAL STATEMENT

2017

Identification Number E8710X	Limited Liability Company Name SOUTHFIELD NEIGHBORHOOD REVITALIZATION INITIATIVE LLC				
Resident agent name and mailing address of the registered office FREDERICK E. ZORN  MI					
The address of the registered office 26000 EVERGREEN RD SOUTHFIELD MI 48076					
<p style="text-align: center;"><b>Electronic Signature</b></p> <table> <tr> <td>Filed By JOSEPH G. COUVREUR</td> <td>Title AUTHORIZED AGENT</td> <td>Phone 734-281-7000</td> </tr> </table> <p><input checked="" type="checkbox"/> I certify that this filing is submitted without fraudulent intent and that I am authorized by the business entity to make any changes reported herein.</p>			Filed By JOSEPH G. COUVREUR	Title AUTHORIZED AGENT	Phone 734-281-7000
Filed By JOSEPH G. COUVREUR	Title AUTHORIZED AGENT	Phone 734-281-7000			
<p style="text-align: center;"><b>Payment Information</b></p> <table> <tr> <td>Payment Amount \$ 25</td> <td>Payment Date/Time 12/05/2016 11:00:25</td> <td>Reference Nbr 71315 6802 E8710X 2017</td> </tr> </table>			Payment Amount \$ 25	Payment Date/Time 12/05/2016 11:00:25	Reference Nbr 71315 6802 E8710X 2017
Payment Amount \$ 25	Payment Date/Time 12/05/2016 11:00:25	Reference Nbr 71315 6802 E8710X 2017			

Required by Section 207, Act 23, Public Acts of 1993

### INFORMATION & INSTRUCTIONS

**Annual Statement must be signed in accordance with MCL 450.4103.**

**For Domestic Limited Liability Companies** - It may be signed by a member, if managed by members, by a manager if managed by managers, or by an authorized agent of the company.

**For Foreign Limited Liability Companies** - Must be signed by a person with authority to do so under the laws of the jurisdiction of its organization.

# EXHIBIT

# 9

SOUTHFIELD NEIGHBORHOOD REVITALIZATION INITIATIVE LLC 19785 W. PLYMOUTH AVE. #1044 SOUTHFIELD, MI 48076		78TH STREET BANK N. LIVING	1007
PAY TO THE ORDER OF: <u>Gerry Witkowski</u>		10/18/2016	
Ten Thousand Five Hundred and 00/100		DOLLARS	
Gerry Witkowski 1908 Tranquil Ct. Commerce Twp, MI 48390		<i>Marked [Signature]</i>	
MEMO 17257 New Hampshire moving cost			

Committee  
Living in MI 08 0017  
20000130001 Oct 24, 2016

*Cashed by Witkowski's*

Posting Date 2016 Oct 26 Posting Check Number  
1007 Amount \$2,500.00

Posting Date 2016 Oct 26 Posting Check Num  
1007 Amount \$2,500.00



# EXHIBIT

# 10

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone number <b>SOUTHFIELD NEIGHBORHOOD          REVITALIZATION INITIATIVE LLC          19785 W 12 MILE RD BOX 404          SOUTHFIELD, MI 48076          (248) 595-8219</b>		<input type="checkbox"/> CORRECTED (if checked)		OMB No 1545-0115 <b>2016</b> Form 1099-MISC	Miscellaneous Income
PAYER'S Federal identification number <b>81-3081056</b>		RECIPIENT'S identification number <b>****-**-4995</b>		Copy B For Recipient	
RECIPIENT'S name, street address, city or town, state or province, country, and ZIP or foreign postal code <b>MARION SINCLAIR          25325 GRODAN RD, APT 220          SOUTHFIELD, MI 48033</b>		1 Rents \$		4 Federal income tax withheld \$	
		2 Royalties \$		6 Medical and health care payments \$	
		3 Other income \$		8 Substantive payments in lieu of dividends or interest \$	
		5 Fishing boat proceeds \$		10 Crop insurance proceeds \$	
		7 Nonemployee compensation \$		11 Excess golden parachute payments \$	
		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/> \$ 2500.00		12 Gross proceeds paid to an attorney \$	
Account number (see instructions)		FATCA filing requirement <input type="checkbox"/>		13 Excess golden parachute payments \$	
15a Section 409A deferrals \$		15b Section 409A income \$		14 Gross proceeds paid to an attorney \$	
				16 State tax withheld \$	
				17 State/Payer's state no. \$	
				18 State income \$	

Form 1099-MISC (Keep for your records) Department of the Treasury - Internal Revenue Service

# EXHIBIT

# 11

12/26/2018

Record Details | City of Southfield | BS&amp;A Online

**17357 NEW HAMPSHIRE** SOUTHFIELD, MI 48075 (Property Address)

Parcel Number: 76-24-25-108-006



1 Image / 1 Sketch

**Property Owner:** SOUTHFIELD NEIGHBORHOOD REVITALIZAT**Summary Information**

## &gt; Residential Building Summary

Building Type: Single-Family Detached  
 Building Area: 1,500 sq. ft.  
 Building Year: 1975

&gt; 25 Invoices Found, Amount Due: 24.00

&gt; Assessed Value: \$0 | Taxable Value: \$0

&gt; Property Tax Information found

&gt; 24 Building Department records found

**Owner and Taxpayer Information****Owner**

**SOUTHFIELD NEIGHBORHOOD REVITALIZAT**  
 19785 W 12 MILE RD # 404  
 SOUTHFIELD, MI 48076

SEE OWNER INFORMATION

**Legal Description**

L17357 NEW HAMPSHIRE SOUTHFIELD, MI 48075

Recalculate amounts using a different Payment Date

You can change your anticipated payment date in order to recalculate amounts due as of the specified date for this property

Enter a Payment Date: 12/26/2018

Recalculate

**Tax History**

Contact the Oakland County Treasurer at (248) 858-0611 for payoff on taxes for delinquent years

Year	Season	Total Amount	Total Paid	Due Date	Total Due
2018	Winter	\$0.00	\$0.00		\$0.00
2018	Summer	\$177.50	\$177.50	07/20/2018	\$0.00
2017	Winter	\$0.00	\$0.00		\$0.00
2017	Summer	\$157.68	\$157.68	07/10/2017	\$0.00
2016	Winter	\$384.57	\$384.57	12/19/2016	\$0.00
2016	Summer	\$2,394.96	\$2,394.96	09/28/2016	\$0.00
2015	Winter	\$462.28	\$0.00		\$462.28
2015	Summer	\$2,160.18	\$0.00		\$2,160.18
2014	Winter	\$458.54	\$0.00		\$458.54
2014	Summer	\$2,112.90	\$0.00		\$2,112.90

*taxes reduced to zero*

\*\* Read Note Above  
 \*\* Read Note Above  
 \*\* Read Note Above  
 \*\* Read Note Above

Load More Years

**\*\*Disclaimer:** BS&A Software provides BS&A Online as a way for municipalities to display information online and is not responsible for the content or accuracy of the data herein. This data is provided for reference only and WITHOUT WARRANTY of any kind, expressed or inferred. Please contact your local municipality if you believe there are errors in the data.

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# EXHIBIT

# 12

SOUTHFIELD NEIGHBORHOOD RENTALIZATION INITIATIVE LLC 10745 W. TWELVE MILE RD #404 SOUTHFIELD, MI 48076		1002
PAY TO THE ORDER OF		9/8/2016
M. S. Title Agency LLC 18877 W 10 Mile Rd Suite 210 Southfield MI 48076		\$ 21,600.00
Twenty-One Thousand Six Hundred and 00/100		DOLLARS
M. S. Title Agency LLC 18877 W 10 Mile Rd Suite 210 Southfield MI 48076		

Posting Date 2016 Sep 16 Posting Check Number  
1002 Amount \$21,600.00

FOR DEPOSIT ONLY U.S. TITLE AGENCY OPERATING ACCOUNT 18418	
---	--

Posting Date 2016 Sep 16 Posting Check Number  
1002 Amount \$21,600.00

# EXHIBIT

# 13

12/26/2018

HABITAT FOR HUMANITY OF OAKLAND COUNTY ELECTS NEW BOARD MEMBERS | Habitat for Humanity of Oakland County

# HABITAT FOR HUMANITY OF OAKLAND COUNTY ELECTS NEW BOARD MEMBERS

Posted: Wednesday, April 6th, 2016

Habitat for Humanity of Oakland County (HFHOC) is pleased to announce the addition of three new board members:

Andy Meisner, Oakland County Treasurer,



Matthew Reynolds, Fiat Chrysler, Head of Design/Process Validation/Prototype Systems/Components,



and J. Grant Smith, President and CEO of Clarkston State Bank.





Each year, HFHOC is fortunate to receive applications from many diverse, highly-qualified individuals," said HFHOC, current Board President, John Carney. "We are delighted to welcome three prominent business people to our board of directors. Their enthusiasm and commitment will benefit our efforts to build, empower and bring together families and individuals in their community."

Habitat for Humanity of Oakland County (HFHOC) is a grassroots organization dedicated to the elimination of poverty and substandard housing. HFHOC accepts donated homes or lots, and builds or renovates in partnership with qualifying families, who pay an affordable mortgage to HFHOC. Since 1996, HFHOC has built and renovated homes in partnership with 200 families, with 62 more taking place this year. Donate, volunteer or learn more at [www.HabitatOakland.org](http://www.HabitatOakland.org) (<https://www.habitatoakland.org/>), or call 248.338.1843.

###

filed under: Announcement (<https://www.habitatoakland.org/category/announcement/>)

Tags: Andy Meisner (<https://www.habitatoakland.org/tag/andy-meisner/>), Board of Directors

(<https://www.habitatoakland.org/tag/board-of-directors/>), Clarkston State Bank

(<https://www.habitatoakland.org/tag/clarkston-state-bank/>), Fiat Chrysler

(<https://www.habitatoakland.org/tag/fiat-chrysler/>), Fiat Chrysler Design

(<https://www.habitatoakland.org/tag/fiat-chrysler-design/>), Habitat for Humanity of Oakland County

(<https://www.habitatoakland.org/tag/habitat-for-humanity-of-oakland-county/>), Habitat Oakland County

(<https://www.habitatoakland.org/tag/habitat-oakland-county/>), J. Grant Smith

(<https://www.habitatoakland.org/tag/j-grant-smith/>), Matthew Reynolds

(<https://www.habitatoakland.org/tag/matthew-reynolds/>), Oakland County

(<https://www.habitatoakland.org/tag/oakland-county/>)

## ReStore Waterford

### Hours

**Mon - Sat** 10 AM to 6 PM

**Sun** 12 PM to 5 PM

3653 Highland Rd

Waterford, MI 48328

248-334-8392 (tel:1-248-338-8392)

Donate/Pick-Up Call 248-365-4090 (tel:1-248-365-4090)



## ReStore Farmington

### Hours

**Tues - Sat** 10 AM to 5:30 PM.

**Sun** 12 PM to 5 PM

28575 Grand River Ave.

Farmington, MI 48336

248-442-2267 (tel:1-248-442-2267)

Donate/Pick-Up Call 248-365-4090 (tel:1-248-365-4090)



## Office

### Office Hours

**Mon. - Fri.**

9:00 AM- 5:00 PM

150 Osmon

Pontiac, MI 48342

248-338-1843

## Quick Links

Privacy Policy (<https://www.habitatoakland.org/privacy-policy/>)



Donate (<https://www.habitatoakland.org/donate/>)


ReStore (<https://www.habitatoakland.org/restore/>)



Homeownership Program (<https://www.habitatoakland.org/housingprograms-information/homeownership-program/>)

News and Events (<https://www.habitatoakland.org/news-and-events/>)

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 (<https://www.facebook.com/HabitatforHumanityOC?ref=ts&fref=ts>)  (<https://twitter.com/HabitatOakldCty?lang=en>)

 (<https://www.linkedin.com/company/habitat-for-humanity-oakland-county>)

 (<https://plus.google.com/u/0/b/103131641179733973708/?pageId=103131641179733973708>)  (<https://www.instagram.com/habitatoaklandcty/>)

 (<https://www.flickr.com/photos/132443299@N02/>)  (<https://www.youtube.com/channel/UCush19LrGyomFlrPjbEcXbpA>)



SOUTHFIELD NEIGHBORHOOD  
REVITALIZATION INITIATIVE LLC  
1300 W. TWELVE MILE RD. 48064  
SOUTHFIELD, MI 48064

FIFTH THIRD BANK  
74 643734

1043

1/24/2017

Pay to the order of Habitat For Humanity of Oakland County \$42,800.19

Forty Two Thousand Eight Hundred and Ninety

Habitat For Humanity of Oakland County  
150 Chumun Street  
Pontiac, Michigan 48342

MEMO

*Michael J. Johnson*

Posting Date 2017 Feb 02 Posting Check Number  
1043 Amount \$42,800.19

Posting Date 2017 Feb 02 Posting Check Number  
1043 Amount \$42,800.19

SOUTHFIELD NEIGHBORHOOD  
REVITALIZATION INITIATIVE LLC  
1300 W. TWELVE MILE RD. 48064  
SOUTHFIELD, MI 48064

FIFTH THIRD BANK  
74 643734

1039

1/24/2017

Pay to the order of Habitat For Humanity \$13,013.93

Thirteen Thousand Thirteen and 93/100

Habitat For Humanity  
Tim Puggles  
180 Canum St  
Pontiac, MI 48341

MEMO

*Michael J. Johnson*

Posting Date 2017 Feb 02 Posting Check Number  
1039 Amount \$13,013.93

Posting Date 2017 Feb 02 Posting Check Number  
1039 Amount \$13,013.93

SOUTHFIELD NEIGHBORHOOD  
REVITALIZATION INITIATIVE LLC  
1300 W. TWELVE MILE RD. 48064  
SOUTHFIELD, MI 48064

FIFTH THIRD BANK  
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Pay to the order of Habitat For Humanity of Oakland County \$8,591.25

Eight Thousand Five Hundred Ninety One and 25/100

Habitat For Humanity of Oakland County  
150 Chumun Street  
Pontiac, Michigan 48342

MEMO

*Michael J. Johnson*

Posting Date 2017 Feb 02 Posting Check Number  
1044 Amount \$8,591.25

Posting Date 2017 Feb 02 Posting Check Number  
1044 Amount \$8,591.25

Jonathan Allman A 325 421 014 293 mI 3325  
2616 Jangtown Street  
Ann Arbor, MI 48103 3/17 Date 2/1/17 017405455  
91-17320

Pay to the order of *ALVAREZ ALTO* \$653.83

*95 Hundred & Fifty Three*

Bank of America

For 971.50.71

*Jonathan Allman*

Posting Date 2017 Feb 02 Posting Check Number  
3325 Amount \$653.83

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>0919052954

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158, Avenue, 91 5310  
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RETURN ITEMS TO THIS BANK  
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Champaign, IL  
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Posting Date 2017 Feb 02 Posting Check Number  
3325 Amount \$653.83